

# APPLICATION FOR FEDERAL ASSISTANCE

OMB Approved No. 3076-0006

Version 7/03

<b>1. TYPE OF SUBMISSION:</b> Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		<b>2. DATE SUBMITTED</b> November 24, 2008	<b>Applicant Identifier</b>
<b>3. DATE RECEIVED BY STATE</b>		<b>State Application Identifier</b>	
<b>4. DATE RECEIVED BY FEDERAL AGENCY</b>		<b>Federal Identifier</b>	

<b>5. APPLICANT INFORMATION</b>	
<b>Legal Name:</b> Miami-Dade County	<b>Organizational Unit:</b> Department: Office of Community and Economic Development
<b>Organizational DUNS:</b> 13-671-7415	<b>Division:</b> Special Projects
<b>Address:</b> Street: 701 NW 1st Court Suite 1400	<b>Name and telephone number of person to be contacted on matters involving this application (give area code)</b> Prefix: First Name: Clarence
<b>City:</b> Miami	<b>Middle Name:</b> Dennard
<b>County:</b> Miami-Dade	<b>Last Name:</b> Brown
<b>State:</b> Florida	<b>Zip Code:</b> 33136
<b>Country:</b> United States of America	<b>Email:</b> cbbrown@miamidadegov
<b>6. EMPLOYER IDENTIFICATION NUMBER (EIN):</b> 59-6006573	
<b>8. TYPE OF APPLICATION:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) Other (specify) <input type="checkbox"/> <input type="checkbox"/>	
<b>7. TYPE OF APPLICANT: (See back of form for Application Types)</b> B. County Other (specify)	
<b>9. NAME OF FEDERAL AGENCY:</b> US Department of Housing and Urban Development	
<b>10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:</b> 14-218	
<b>11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:</b> Neighborhood Stabilization Program. Acquisition and Rehabilitation of single family and multi-family residential properties. Providing down payment assistance and closing cost assistance. The redevelopment of vacant property, as well as the demolition of blighted structures.	
<b>12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.):</b> Miami-Dade County's Entitlement Area	
<b>13. PROPOSED PROJECT</b> Start Date: February 1, 2009 Ending Date: July 31, 2013	
<b>14. CONGRESSIONAL DISTRICTS OF:</b> a. Applicant: 17, 18, 20, 21, 25 b. Project: 17, 18, 20, 21, 25	
<b>15. ESTIMATED FUNDING:</b>	
a. Federal	\$ 62,207,200
b. Applicant	\$
c. State	\$
d. Local	\$
e. Other	\$
f. Program Income	\$
g. TOTAL	\$ 62,207,200
<b>16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?</b> a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE: b. No. <input checked="" type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
<b>17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?</b> <input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No	
<b>18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.</b>	
<b>a. Authorized Representative</b> Prefix: First Name: George Middle Name: M. Last Name: Burgess b. Title: County Manager c. Telephone Number (give area code): 305-375-5311 d. Signature of Authorized Representative: [Signature] e. Date Signed: November 25, 2008	

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Standard Form 424 (Rev.9-2003)  
Prescribed by OMB Circular A-102

# **THE NSP SUBSTANTIAL AMENDMENT**

<p>Jurisdiction(s): <b>Miami-Dade County</b>  <i>(identify lead entity in case of joint agreements)</i></p> <p>Jurisdiction Web Address:  <b><a href="http://www.miamidade.gov/CED/">http://www.miamidade.gov/CED/</a></b>  <i>(URL where NSP Substantial Amendment materials are posted)</i></p>	<p>NSP Contact Person: <b>Clarence D. Brown</b>  Address: <b>Miami-Dade County</b>  <b>Office of Community and Economic Development</b>  <b>701 NW 1st Court, 14<sup>th</sup> Floor</b>  <b>Miami, Florida 33136</b></p> <p>Telephone: <b>(786) 469-2221</b>  Fax: <b>(786) 469-2170</b>  Email: <b>CDBROWN@miamidade.gov</b></p>
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## ***A. AREAS OF GREATEST NEED***

Provide summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction.

**Note:** An NSP substantial amendment must include the needs of the entire jurisdiction(s) covered by the program; states must include the needs of communities receiving their own NSP allocation. To include the needs of an entitlement community, the State may either incorporate an entitlement jurisdiction's consolidated plan and NSP needs by reference and hyperlink on the Internet, or state the needs for that jurisdiction in the State's own plan. The lead entity for a joint program may likewise incorporate the consolidated plan and needs of other participating entitlement jurisdictions' consolidated plans by reference and hyperlink or state the needs for each jurisdiction in the lead entity's own plan.

HUD has developed a foreclosure and abandonment risk score to assist grantees in targeting the areas of greatest need within their jurisdictions. Grantees may wish to consult this data [LINK – to HUD USER data], in developing this section of the Substantial Amendment.

### **Response:**

#### ***Brief Summary of Residential Foreclosure Activity in Miami-Dade County***

There were approximately 6,600 foreclosed properties throughout Miami-Dade County that were repossessed by the lender (REOs) from November 2007 through August of 2008. Many of those foreclosures were concentrated in the southern part of the County east of Hwy US 1, in the north central part of the County, and in several pockets of concentration along the high residential density corridors in coastal areas. There were nearly 3,400 REO foreclosures over the period from May to August 2008 and these widely distributed across the county. The geographic pattern in foreclosures, however, also continued to manifest areas of concentration similar to those mentioned above. (See Figures A-1 and A-2 for maps showing the locations of each foreclosed upon single family home and condominium.)

The data on the market value of REO properties from May through July, as indicated in the County Property Appraiser's records suggest that a significant number of those properties would be affordable to families earning 120 percent or less of AMI. Approximately 25 percent of foreclosed residential properties were repossessed by the lender in the four months ending on August 30<sup>th</sup> within Miami-Dade County's entitlement area were estimated to have a market value on January 1, 2008 of less than \$180,000.

The distribution of market values of foreclosed REO properties from November 2007 through July 2008 are shown in Table A-1 by sub-county areas. The geographic areas identified in this table refers to the 13 County Commission Districts shown in Figures A-1 and A-2. The data in Table A-1 indicates that a large pool of the foreclosed REO properties is likely to be in a price range that is affordable to families that meet the NSP income eligibility threshold.

**Table A-1. Real Estate Owned Foreclosures in Miami-Dade County (May - July 2008)**  
**Selected Statistics By Commission Districts**

Commission District	Total in District							Excluding Cities Receiving Direct Award of NSP Funds				
	Number of REOs	Cases per 1000 housing units	Mean Market Value \$	25% of cases are below:	Median Market Value \$	25% of cases are above:		Number of REOs	Mean Market Value \$	25% of cases are below:	Median Market Value \$	25% of cases are above:
1	168	3.1	\$181,863	\$154,408	\$180,214	\$203,641		57	\$183,238	\$152,867	\$171,108	\$213,457
2	166	3.2	\$191,725	\$139,009	\$188,563	\$227,831		112	\$188,278	\$137,066	\$184,743	\$223,898
3	191	3.0	\$245,264	\$161,572	\$207,036	\$282,310		56	\$236,644	\$157,305	\$201,379	\$292,986
4	271	2.6	\$298,139	\$176,320	\$239,190	\$373,630		215	\$282,670	\$176,773	\$250,270	\$372,750
5	183	1.8	\$339,069	\$234,840	\$321,141	\$399,730		0	NA	NA	NA	NA
6	131	2.0	\$306,886	\$245,700	\$295,519	\$349,490		67	\$332,772	\$258,108	\$328,094	\$392,057
7	192	2.3	\$454,456	\$281,228	\$357,228	\$499,464		53	\$512,328	\$279,528	\$421,669	\$600,646
8	285	3.9	\$283,115	\$189,978	\$238,012	\$325,222		264	\$290,568	\$200,257	\$245,411	\$328,856
9	473	6.2	\$226,523	\$165,620	\$217,500	\$265,711		281	\$243,743	\$191,945	\$230,953	\$273,157
10	158	2.6	\$282,982	\$180,288	\$279,883	\$339,946		158	\$282,982	\$180,288	\$299,883	\$339,946
11	228	3.4	\$305,288	\$211,830	\$296,698	\$370,934		228	\$305,288	\$211,830	\$296,698	\$370,934
12	177	2.8	\$269,659	\$187,260	\$245,780	\$301,400		126	\$299,245	\$217,660	\$275,900	\$359,577
13	156	2.5	\$244,025	\$167,023	\$234,866	\$289,816		88	\$249,952	\$167,023	\$214,639	\$303,607
Countywide	2,779	3.0	\$276,367	\$178,313	\$241,099	\$319,895		1,705	\$277,974	\$181,793	\$244,040	\$329,914

Note: The cities of Hialeah, Homestead, Miami, Miami Gardens, and North Miami received a direct allocation of NSP funds. 2) Real Estate Owned properties (REOs) refer to foreclosed upon home where the lender has taken possession.

Source: Realty-Trac, Miami-Dade Department of Planning & Zoning, Planning Research Section, September 2008.

There were 5,050 *lis pendens* filed between May and July 2008 in the entire county, of which 3,314 were filed in areas within the County's CDBG jurisdiction. An additional 951 *lis pendens* were filed in August. The locations of the properties entering the foreclosure process during the May through August period are shown in Figure A-3. While there continue to be significant levels of new foreclosures filed on properties within areas of high REO concentrations, the recent *lis pendens* appear to be disproportionately increasing in the central-western part of the County. Table A-2 summarizes this data by broad geographic areas (county commission district) and provides the average and median loan default values for these potential future foreclosures and the range of variation in default values around the median default value.

**Table A-2. Lis Pendens in Miami-Dade County (May - July 2008)**  
**Selected Statistics By Commission Districts**

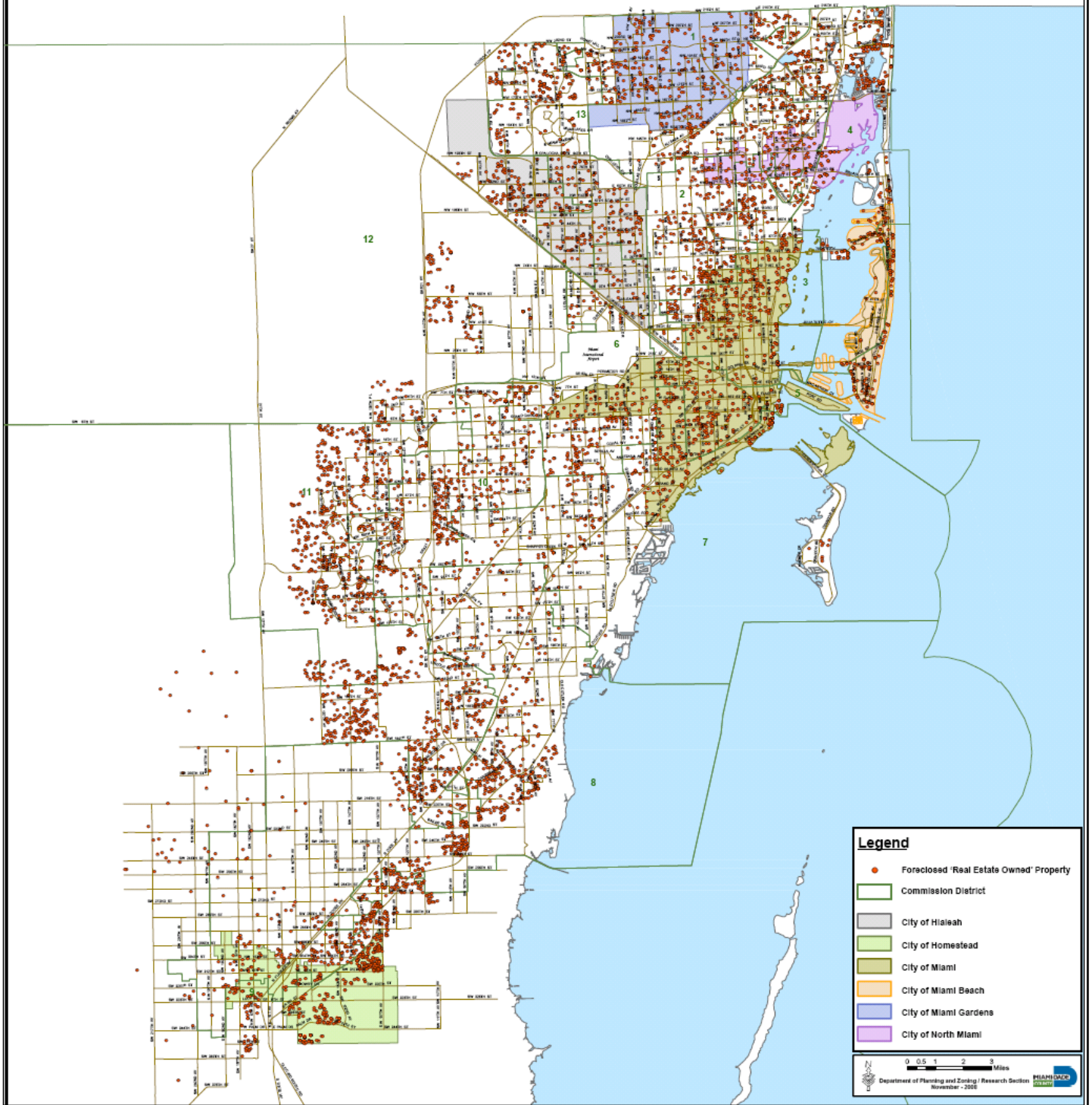
Commission District	Total in District						Excluding Cases In Cities Receiving Direct Award of NSP Funds					
	Number of Cases	Cases per 1000 housing units	Mean Default Value \$	25% of cases are below:	Median Default Value \$	25% of cases are above:	Number of Cases	Cases per 1000 housing units	Mean Default Value	25% of cases are below:	Median Default Value \$	25% of cases are above:
1	305	5.5	\$189,635	\$144,000	\$187,379	\$229,069	121	NA	\$190,327	\$150,215	\$186,155	\$234,733
2	283	5.5	\$185,982	\$128,941	\$186,342	\$236,919	202	NA	\$191,567	\$132,666	\$191,591	\$239,978
3	276	4.3	\$258,296	\$169,677	\$227,839	\$313,430	80	NA	\$294,038	\$184,411	\$237,870	\$405,296
4	536	5.1	\$343,733	\$173,815	\$255,899	\$404,382	430	NA	\$327,418	\$178,324	\$257,995	\$387,532
5	321	3.2	\$388,495	\$197,130	\$295,877	\$422,035	4	NA	\$2,254,777	----	----	----
6	242	3.7	\$285,342	\$200,535	\$282,373	\$345,350	109	NA	\$304,855	\$199,811	\$288,000	\$385,296
7	317	3.7	\$411,883	\$200,199	\$820,867	\$496,281	138	NA	\$389,208	\$172,095	\$282,101	\$452,849
8	498	6.8	\$319,567	\$194,860	\$244,712	\$353,587	460	NA	\$321,774	\$195,571	\$251,178	\$364,566
9	725	9.5	\$239,044	\$165,678	\$219,886	\$277,859	457	NA	\$253,630	\$181,598	\$235,541	\$288,856
10	277	4.5	\$254,380	\$166,923	\$220,136	\$335,866	277	NA	\$254,380	\$166,923	\$220,136	\$335,866
11	536	8.0	\$276,976	\$166,448	\$255,217	\$338,210	536	NA	\$276,976	\$166,448	\$255,217	\$338,210
12	415	6.6	\$245,287	\$153,724	\$223,430	\$294,857	280	NA	\$267,834	\$188,286	\$248,567	\$318,024
13	319	5.2	\$239,673	\$158,911	\$224,182	\$307,498	205	NA	\$246,819	\$163,614	\$209,531	\$306,745
Countywide	5,050	5.5	\$281,197	\$167,650	\$232,000	\$325,409	3,314	NA	\$282,036	\$171,859	\$237,305	\$329,274

Notes: 1) The cities of Hialeah, Homestead, Miami, Miami Gardens, and North Miami received a direct allocation of NSP funds. 2) Lis Pendens refers to the legal notice that represents the initiation of a foreclosure lawsuit. 3) NA -- A count of housing units in areas excluding cities with direct allocations is not yet available.

Source: Realty-Trac, Miami-Dade Department of Planning & Zoning, Planning Research Section, September 2008.

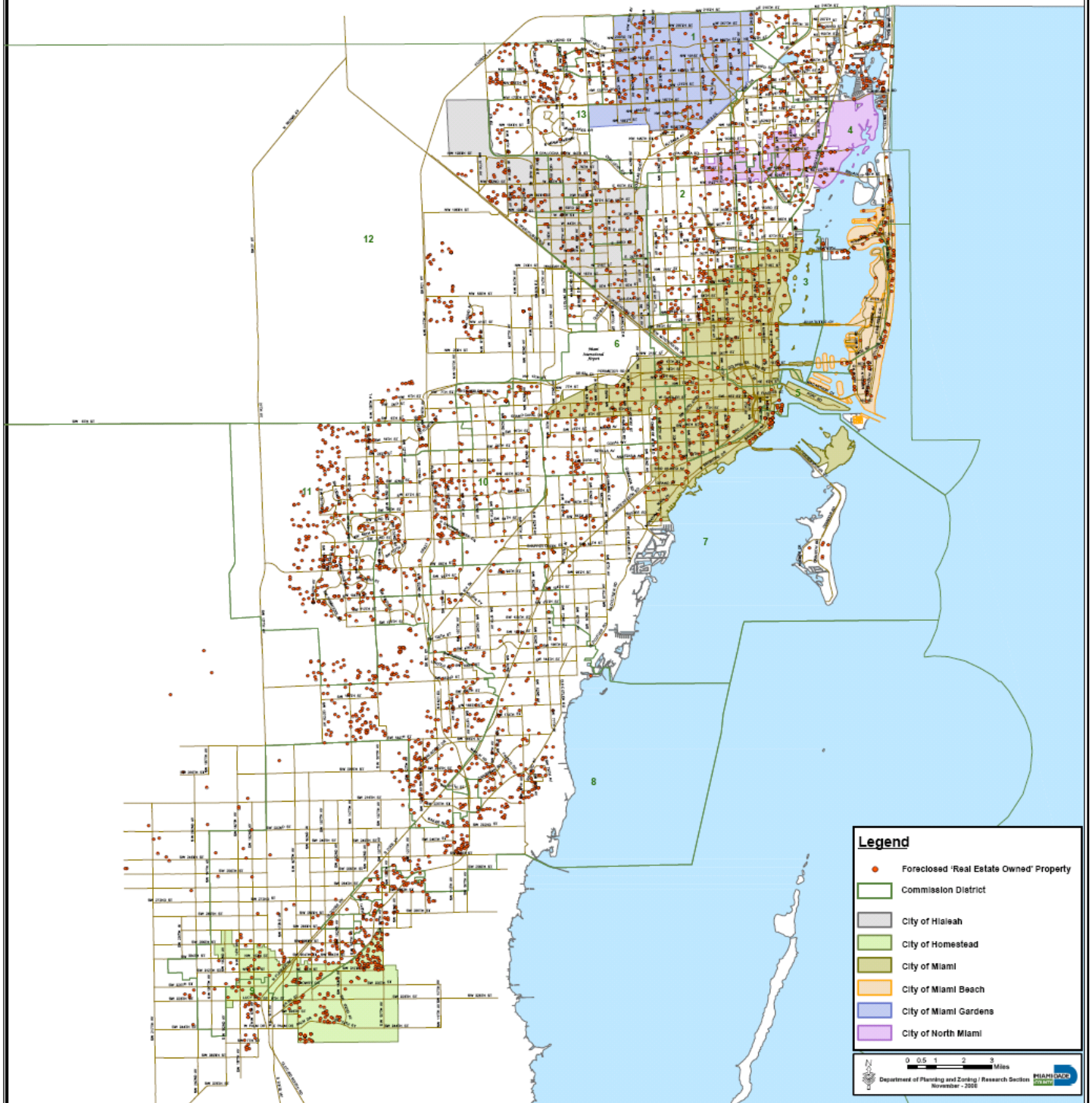
**Figure A-1**

**Foreclosed 'Real Estate Owned' Properties (6,597)  
by Commission District  
November 2007 to August 2008**



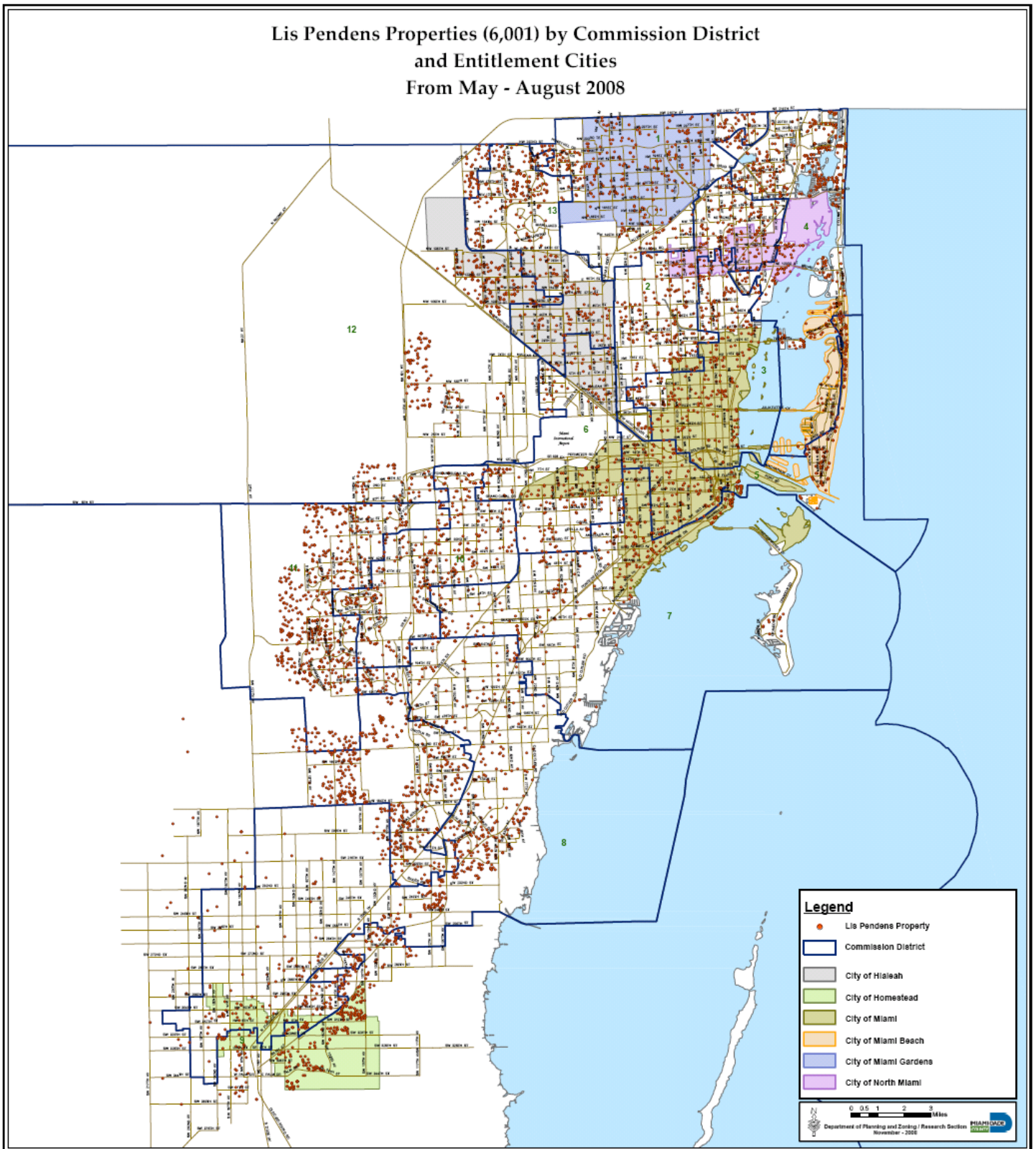
**Figure A-2**

**Foreclosed 'Real Estate Owned' Properties (3,358)  
by Commission District  
May 2008 to August 2008**





**Figure A-3**



### ***Identifying Areas of Greatest Need***

Title III of the Housing and Economic Recovery Act of 2008 directs NSP grantees to give “priority emphasis and consideration” to low and moderate income areas (as defined in the Notice) and “other areas with the greatest need”, including those: 1) with the greatest percentage of homes in foreclosures; 2) with the highest percentage of homes financed by subprime mortgage related loans; and 3) identified by the County as likely to face a significant rise in the rate of home foreclosures. County staff has been analyzing foreclosure data with this directive in mind, and has identified the areas with high concentrations of residents that meet the income eligibility threshold, and mapped the incidence of foreclosed homes during the nine months from November 2007 to August 2008 as well as the incidence of homes for which a foreclosure action has been initiated between May and August 2008.

County staff has utilized foreclosure data from Realtytrac Inc. (Irvine, CA), as well as the income data and foreclosure risk indices provided by HUD, to determine the areas of greatest need within the County’s entitlement jurisdiction. HUD data provides the percent of persons that meet the NSP income eligibility thresholds and a foreclosure risk score by census tract block groups. The foreclosure data from Realtytrac was used to identify the number of REO foreclosures that occurred over the 10-month period ending August 2008, and the properties with *lis pendens* filings in the three months from May through August by census tract block group.

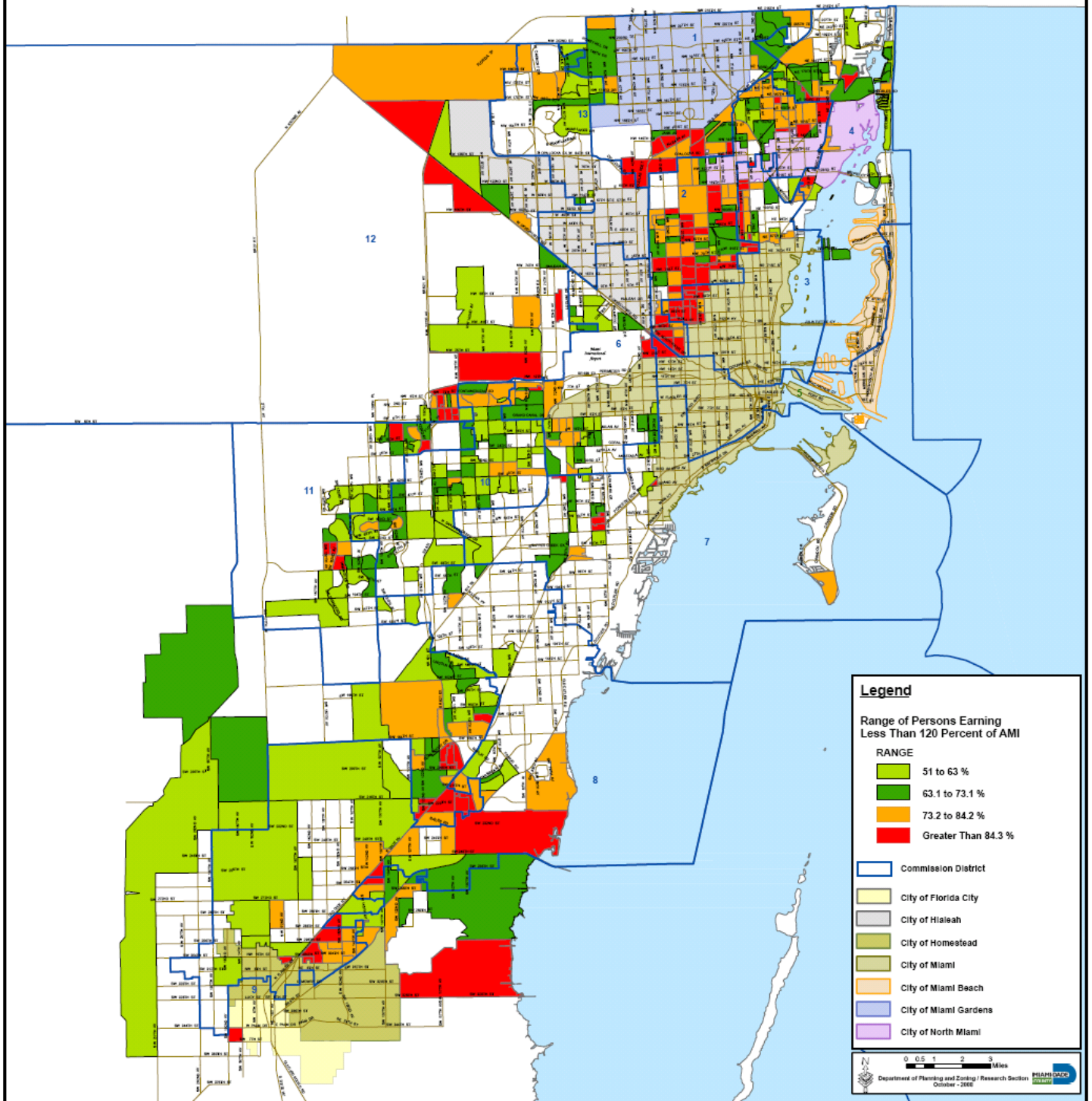
The map in Figure A-4 shows the distribution of census tract block groups (“block groups”) within Miami-Dade County’s CDBG jurisdiction where at least 51 percent of the residents meet the NSP income eligibility threshold of 120 percent of AMI or below. Some block groups, of course, have a higher proportion of residents with incomes at or below the NSP income eligibility threshold. County staff separated all the block groups that meet the NSP income eligible threshold into four equal groups or “quartiles.” Figure A-4 shows that the block groups with the highest concentration of population that meet the income eligibility threshold are generally found in the north-central and the southeastern areas of the County.

Figure A-5 indicates the incidence of REO foreclosures that occurred between November 2007 and August 2008 within those block groups in the County’s CDBG jurisdiction and where at least 51 percent of the residents are within the NSP income eligibility threshold. Figure A-6 shows the location of REO foreclosures that occurred between May 2008 and August 2008 within those same block groups. The analysis of REO foreclosures over this period reveals the geographic concentration of properties that were the subject of an initiation of a foreclosure action in the block groups that are identified as *low-moderate-and-middle-income* and located in the County’s CDBG jurisdiction.



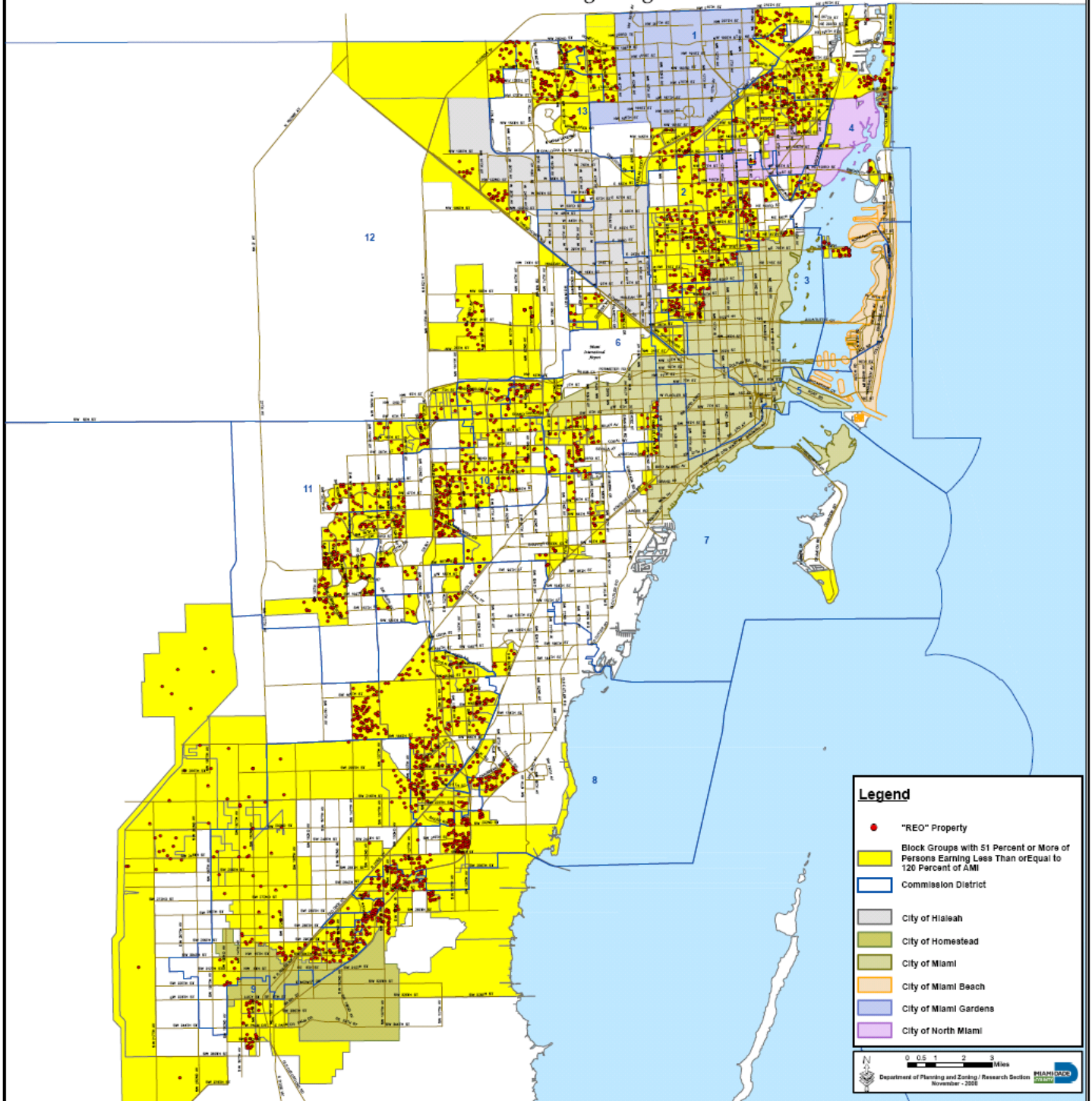
**Figure A-4**

**Eligible Block Group in Miami-Dade County  
by Percent of Persons Earning Less Than 120 Percent of AMI**



**Figure A-5**

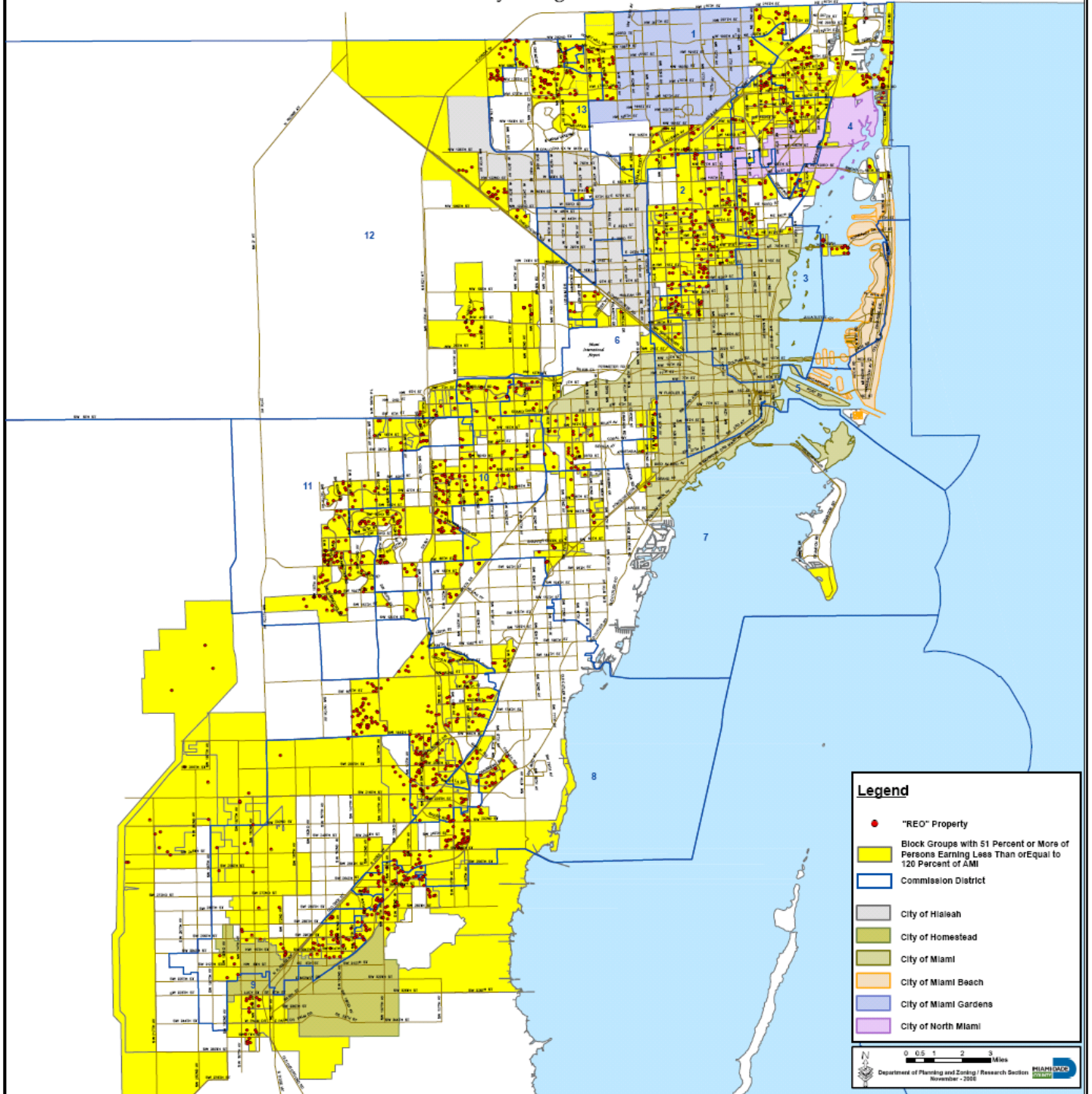
**Foreclosed "Real Estate Owned" Properties (2,916)  
by Income Eligible Block Groups in Miami-Dade County  
November 2007 through August 2008**





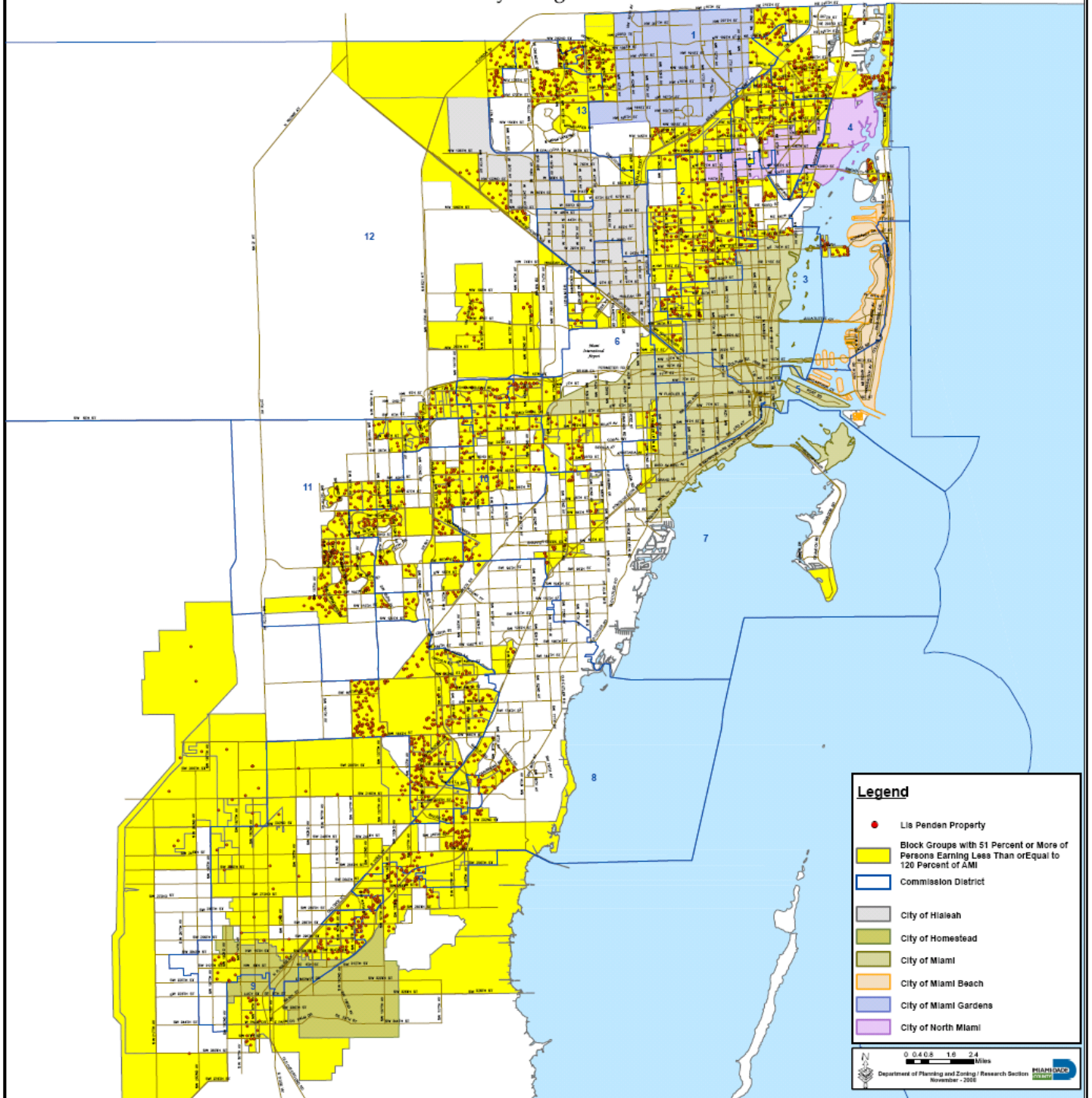
**Figure A-6**

**Foreclosed "Real Estate Owned" Properties (1,546)  
by Income Eligible Block Groups in Miami-Dade County  
May - August 2008**



**Figure A-7**

**Lis Pendens Properties (2,823)  
by Income Eligible Block Groups in Miami-Dade County  
May - August 2008**



The data on percent of residents within each block group that met the NSP income threshold, the incidence and intensity of recent REO foreclosures, the number of properties receiving a notice of foreclosure as a ratio of the number of housing units in the block group, and the value of HUD's foreclosure risk score were combined to determine an index of greatest need (IGN) for each block group. (See formula below.)

The IGN was used to rank the block groups from highest to lowest area of need. The block groups ranked according to their IGN values were then separated into quartiles. The first set of block groups with the highest IGN values was designated as areas to receive "highest priority" emphasis. The block groups in the second quartile of IGN index values were identified as "high priority". The block groups in the third quartile were classified as "moderate priority." The block groups in the fourth quartile were considered "priority" areas. Block groups with less than 51 percent of persons in households with incomes at or below 120 percent of AMI were considered to be low priority areas.

### **The IGN Formula**

$$IGN = 0.15 \times M + 0.20 \times REON + .15 \times REOR_{10} + 0.20 \times REOR_4 + 0.15 \times R + 0.15 \times LIS$$

M = percent of persons with incomes at 120% of AMI or below

REON = number of REOs during the four months from May to August 2008

REOR<sub>10</sub> = REO foreclosure rate (as a percent of residential units in 2007) from November 2007 to August 2008

REOR<sub>4</sub> = REO foreclosure rate from May to August 2008

R = HUD foreclosure risk score (includes percent of subprime mortgage loans)

LIS = Lis pendens from May to August 2008 as a proportion of residential units as of January 2008

All the variables in the IGN formula were scaled according to their standard deviation, and the index of greatest need represents a weighed average of the area income indicator, the indicators of area foreclosure activity, and the foreclosure risk indicators identified above.

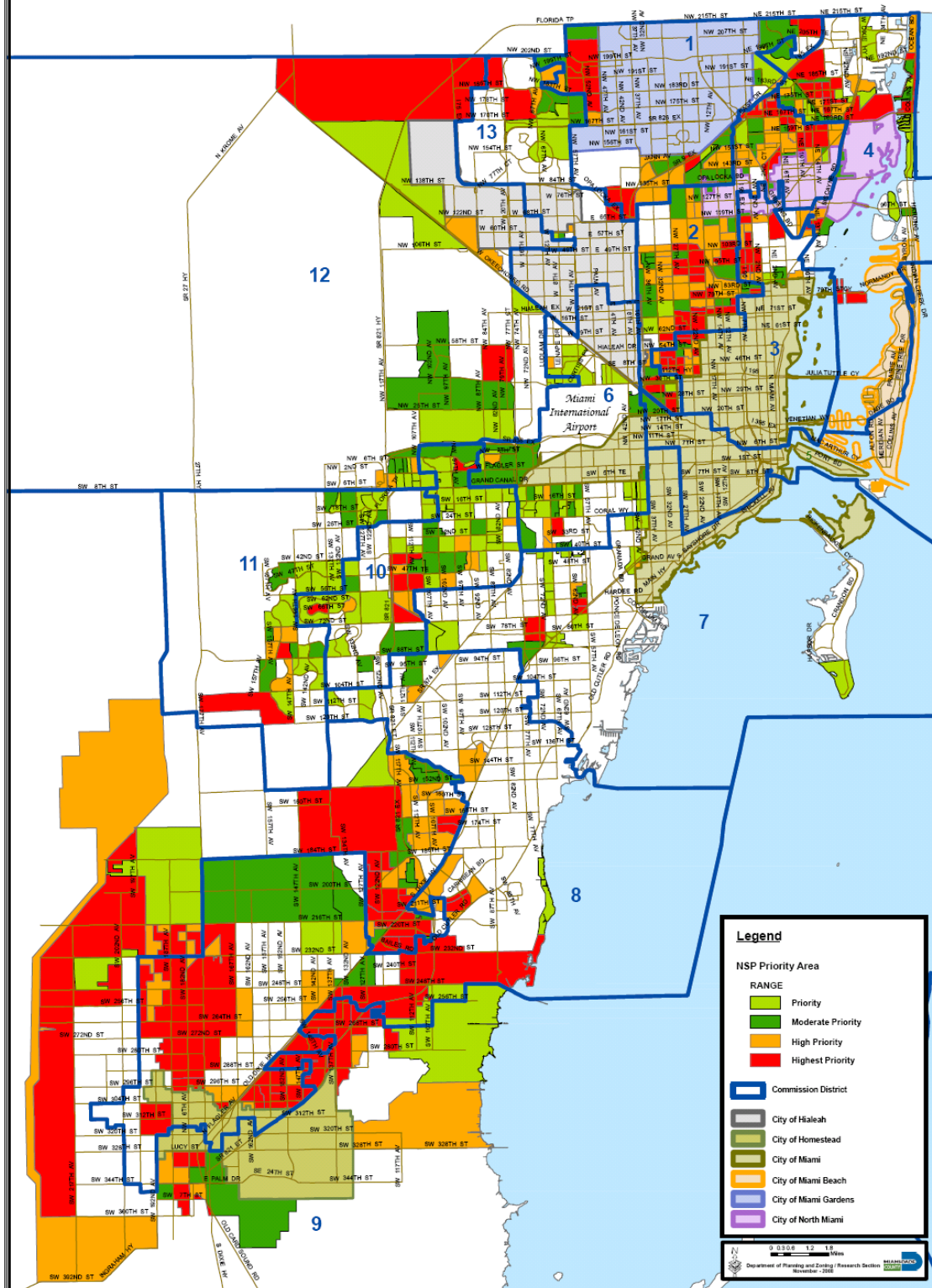
### **The Location of Areas of Greatest Need and Priority Emphasis**

Figure A-8 is the map showing the location of designated as areas of greatest need under the County's proposed NSP program. Those areas designated with higher priority generally have a higher percentage of individuals that meet the NSP income eligibility threshold, have higher numbers of foreclosures, have higher rates of foreclosure, and have a higher likelihood of a significant increase of foreclosures in the near future than those areas that are designated with lower priority. Table A-3 provides the IGN index values for each of the block groups shown in Figure A-8 and the data that went into their IGN score.



**Figure A-8**

**NSP Priority Rankings of Census Tract Block Groups by Index of Greatest Need  
Within Miami-Dade County CDBG Jurisdictional Area**



*Miami-Dade County NSP Substantial Amendment*

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
<b>Highest Priority Level, Average</b>			<b>3.15</b>	<b>9.48</b>	<b>79.33</b>	<b>6.73</b>	<b>11.66</b>	<b>18.98</b>	<b>12.40</b>
<b>High Priority Level, Average</b>			<b>2.45</b>	<b>9.15</b>	<b>76.38</b>	<b>2.32</b>	<b>4.02</b>	<b>8.55</b>	<b>8.64</b>
<b>Moderate Priority Level, Avg</b>			<b>2.11</b>	<b>8.71</b>	<b>75.63</b>	<b>1.19</b>	<b>1.78</b>	<b>3.71</b>	<b>4.25</b>
<b>Priority Level, Average Values</b>			<b>1.79</b>	<b>7.44</b>	<b>66.53</b>	<b>0.83</b>	<b>1.16</b>	<b>2.88</b>	<b>2.76</b>
000203	5	1	7.553	10	100	1	125.0	125.0	0.0
010602	9	1	5.245	9	89	33	21.3	43.2	25.8
001802	4	1	4.466	10	93	3	18.5	30.9	55.6
010173	1	1	4.374	9	52	46	7.4	14.7	14.9
001006	3	1	4.342	10	94	4	24.5	42.9	30.7
000403	2	1	4.095	10	86	15	24.7	31.3	8.2
000408	1	1	4.048	10	98	1	41.7	41.7	0.0
010704	1	1	4.016	10	74	18	16.2	29.6	17.1
010144	1	1	3.957	9	78	35	5.3	9.4	10.3
010800	2	1	3.883	10	84	9	23.6	31.4	13.1
009008	1	1	3.804	9	74	22	11.1	17.2	19.2
008700	5	1	3.774	8	73	8	26.1	32.7	22.9
010131	1	1	3.721	7	74	33	7.2	10.3	13.8
010500	2	1	3.709	10	78	14	11.4	20.3	21.2
010400	1	1	3.676	9	100	2	17.5	26.3	26.3
008303	2	1	3.675	10	96	5	19.6	23.5	15.7
010704	4	1	3.651	10	80	16	11.6	18.9	13.8
001702	5	1	3.621	10	86	4	18.7	28.0	18.7
010800	3	1	3.559	10	82	2	9.5	28.6	33.3
011004	2	1	3.547	9	76	14	16.3	23.2	11.6
001002	2	1	3.539	10	62	3	15.1	20.1	40.2
000115	2	1	3.530	9	54	28	6.6	13.7	12.7
010800	1	1	3.526	10	100	9	11.6	16.8	12.9
010800	9	1	3.481	10	93	13	7.6	15.3	12.9
001004	1	1	3.445	10	87	3	14.4	38.3	9.6
001502	3	1	3.443	10	95	3	22.1	22.1	7.4
011300	4	1	3.421	10	94	7	17.5	17.5	7.5
001101	3	1	3.364	10	91	2	8.5	21.3	25.5
001502	1	1	3.360	10	90	10	9.7	24.3	5.8
000205	2	1	3.355	10	82	5	13.2	23.8	15.9
011201	5	1	3.352	10	63	3	25.0	33.3	8.3
010607	4	1	3.335	9	71	5	16.6	36.4	13.2
001801	5	1	3.333	10	89	4	21.6	27.0	0.0

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
001802	6	1	3.324	10	81	2	17.1	34.2	8.5
011402	3	1	3.313	10	93	7	11.7	18.3	10.0
010602	9	1	3.290	9	100	4	7.8	27.1	15.5
001702	1	1	3.285	10	92	3	9.2	21.5	18.4
008303	1	1	3.279	10	73	2	8.5	17.1	34.2
001102	3	1	3.273	10	81	4	10.9	32.7	10.9
009015	2	1	3.261	9	82	14	10.1	15.1	8.7
008700	6	1	3.238	8	73	8	20.8	31.2	5.2
010703	3	1	3.238	9	55	5	17.1	30.8	20.5
011001	4	1	3.234	10	84	6	13.0	21.6	8.7
011100	6	1	3.224	9	83	1	12.8	38.5	12.8
011300	5	1	3.210	10	94	7	10.5	17.9	6.0
001203	3	1	3.191	10	83	7	15.4	15.4	6.6
010703	1	1	3.180	9	63	15	9.4	17.6	11.9
000204	1	1	3.172	9	80	8	13.7	17.2	12.0
001701	1	1	3.160	10	89	4	11.7	17.5	11.7
001801	1	1	3.137	10	93	4	14.8	18.5	3.7
000205	5	1	3.117	10	86	1	5.8	11.6	29.1
001702	2	1	3.109	10	98	4	11.1	16.6	5.5
010156	2	1	3.103	9	87	12	6.9	11.5	9.2
010900	2	1	3.103	10	92	8	6.1	11.4	10.6
011100	4	1	3.097	9	93	3	17.8	17.8	5.9
003904	1	1	3.095	9	66	20	4.9	8.7	8.0
001103	2	1	3.081	10	63	1	13.9	13.9	27.8
010204	2	1	3.078	9	59	7	10.2	21.9	21.9
010607	2	1	3.069	9	62	9	13.4	25.3	8.9
010703	2	1	3.067	9	67	11	9.3	17.8	12.7
011003	1	1	3.066	9	78	5	17.3	20.8	6.9
001002	4	1	3.060	10	94	3	9.5	25.4	3.2
010203	4	1	3.037	9	88	5	8.2	21.2	11.4
000206	2	1	3.016	10	80	6	9.5	17.5	7.9
001003	5	1	3.015	10	90	2	7.5	15.1	15.1
001103	2	1	3.008	10	82	7	12.5	16.0	1.8
001004	6	1	3.001	10	100	1	8.0	8.0	16.0
010602	1	1	3.001	9	86	5	10.5	14.7	12.6
001103	3	1	3.000	10	94	3	8.7	11.6	11.6
010205	2	1	2.996	9	69	6	14.9	19.8	9.9

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
011004	3	1	2.990	9	81	6	10.0	16.7	11.7
000202	4	1	2.990	10	68	7	8.7	13.7	15.0
011202	1	1	2.971	9	58	4	18.2	27.3	9.1
001002	5	1	2.968	10	83	3	9.5	19.0	9.5
010800	9	1	2.967	10	90	4	5.9	17.8	8.9
000305	2	1	2.941	10	73	6	8.7	8.7	15.9
011201	3	1	2.926	10	57	5	7.0	14.0	23.8
010500	2	1	2.924	10	82	0	0.0	8.4	33.6
000205	5	1	2.918	10	77	1	20.0	20.0	0.0
010111	4	1	2.913	9	55	14	8.0	15.5	8.6
010005	5	1	2.888	9	77	5	9.2	11.0	16.5
000202	1	1	2.868	10	63	3	9.4	9.4	22.0
011003	2	1	2.860	9	83	7	7.2	12.4	9.3
000205	4	1	2.860	10	69	2	11.0	27.6	5.5
011402	5	1	2.856	10	92	3	7.2	12.1	7.2
011402	5	1	2.856	10	92	3	7.2	12.1	7.2
000408	3	1	2.847	10	82	4	10.3	12.9	5.2
000203	4	1	2.846	10	82	5	6.2	8.7	11.2
001103	1	1	2.844	10	64	3	7.6	12.7	20.3
001703	4	1	2.836	9	89	4	14.7	14.7	0.0
007603	3	1	2.835	10	100	2	5.5	16.6	2.8
010159	1	1	2.824	9	74	11	6.3	8.6	7.5
000205	2	1	2.822	10	81	1	16.7	16.7	0.0
009702	9	1	2.816	10	81	12	2.7	4.8	3.4
001703	2	1	2.810	9	91	3	4.8	4.8	19.4
009801	1	1	2.789	9	79	3	5.8	7.7	21.2
001101	1	1	2.788	10	70	4	4.2	8.4	19.9
007603	4	1	2.780	10	95	2	5.8	11.7	5.8
000106	3	1	2.775	9	63	15	4.5	6.9	6.3
010204	3	1	2.763	9	81	5	7.7	12.3	9.3
001803	5	1	2.762	10	86	1	5.1	15.4	10.3
000408	1	1	2.757	10	87	4	4.9	9.9	7.4
001502	2	1	2.756	10	88	1	4.9	14.7	9.8
000202	2	1	2.756	10	83	2	3.5	14.2	12.4
010167	2	1	2.752	7	54	15	5.4	9.4	18.5
006001	4	1	2.744	8	69	4	6.0	27.1	13.6
001004	2	1	2.737	10	86	2	3.6	12.5	10.7

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
001801	4	1	2.735	10	87	1	4.2	16.8	8.4
000407	4	1	2.730	9	94	2	6.7	10.0	10.0
000407	6	1	2.727	9	89	4	12.0	12.0	0.0
010800	9	1	2.726	10	51	3	14.9	29.7	0.0
010114	1	1	2.724	8	74	11	5.6	9.2	9.2
010007	2	1	2.720	8	68	12	4.7	8.2	11.7
010500	1	1	2.716	10	90	2	2.4	9.8	11.0
008700	8	1	2.710	8	59	5	9.2	27.5	11.0
011500	4	1	2.705	8	51	7	15.4	28.6	2.2
010203	4	1	2.702	9	69	10	4.5	6.8	10.4
000204	2	1	2.700	9	80	4	7.1	10.6	10.6
010203	3	1	2.698	9	80	4	9.4	11.7	7.0
008700	3	1	2.687	8	62	5	10.5	19.0	12.7
007703	2	1	2.679	9	70	10	5.2	7.7	7.2
001003	2	1	2.678	10	80	1	4.2	12.7	12.7
000407	2	1	2.674	9	69	3	11.8	15.7	7.8
011004	1	1	2.673	9	62	0	0.0	10.5	36.8
000201	2	1	2.669	10	72	4	5.3	11.9	9.2
000502	9	1	2.665	9	93	1	8.3	8.3	8.3
000206	3	1	2.663	10	74	2	5.0	15.1	10.1
000116	1	1	2.662	10	76	7	2.4	6.4	8.1
010300	6	1	2.657	8	52	8	11.1	20.7	8.3
007200	3	1	2.652	10	62	1	17.9	17.9	0.0
001203	2	1	2.650	10	78	3	5.5	9.1	9.1
001003	1	1	2.650	10	73	2	5.1	15.2	10.1
001102	4	2	2.649	10	94	1	3.6	3.6	10.9
010300	9	2	2.648	8	60	0	0.0	0.0	50.0
008303	3	2	2.648	10	84	2	3.8	7.5	11.3
000302	1	2	2.640	9	76	2	4.5	13.4	15.7
000206	1	2	2.633	10	86	2	3.0	3.0	13.5
001701	4	2	2.628	10	84	1	2.3	2.3	18.1
001006	1	2	2.628	10	61	3	10.5	14.0	7.0
000210	2	2	2.624	10	84	2	3.0	7.6	10.7
001801	2	2	2.619	10	88	0	0.0	20.5	6.8
000503	2	2	2.618	10	78	3	6.7	11.2	4.5
008303	4	2	2.618	10	76	4	4.8	7.2	8.4
000408	2	2	2.615	10	86	1	2.2	13.0	8.7



**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
000403	3	2	2.600	10	82	4	3.4	10.1	4.2
000404	3	2	2.596	9	80	3	6.1	12.1	8.1
010900	1	2	2.593	10	83	2	4.5	9.0	6.8
008411	1	2	2.591	9	69	5	6.6	13.2	7.9
000902	2	2	2.586	9	84	1	1.9	5.8	19.4
008700	7	2	2.585	8	66	3	8.3	13.9	16.7
006002	3	2	2.575	8	83	2	7.2	18.1	7.2
011402	6	2	2.575	10	95	2	2.8	5.6	4.2
001006	1	2	2.571	10	100	0	0.0	0.0	13.3
000201	3	2	2.569	10	79	5	3.0	6.0	6.0
008306	3	2	2.568	9	62	5	7.6	13.7	9.1
001203	5	2	2.566	10	63	5	7.7	9.2	6.2
001004	4	2	2.557	10	87	1	8.8	8.8	0.0
010206	3	2	2.556	8	87	2	6.1	9.2	12.2
011500	3	2	2.555	8	66	2	6.4	19.2	16.0
009200	1	2	2.553	8	58	2	16.8	16.8	8.4
000204	1	2	2.553	9	69	0	0.0	20.0	20.0
010607	3	2	2.551	9	80	2	3.2	8.1	14.5
000502	3	2	2.549	9	87	4	6.9	8.6	1.7
000205	3	2	2.549	10	73	1	5.2	10.3	10.3
000902	4	2	2.542	9	84	1	3.4	3.4	17.2
010143	2	2	2.541	8	72	10	3.8	5.3	8.7
000901	2	2	2.540	8	71	2	10.3	15.4	10.3
010607	1	2	2.535	9	61	4	5.1	12.8	14.1
010704	3	2	2.534	10	71	1	5.0	5.0	14.9
000407	1	2	2.529	9	81	2	5.4	10.9	8.2
000205	1	2	2.521	10	77	0	0.0	13.4	13.4
006001	5	2	2.520	8	61	5	11.2	13.4	8.9
000114	2	2	2.520	8	71	10	5.1	7.1	5.1
001702	3	2	2.518	10	100	0	0.0	0.0	10.5
007603	1	2	2.516	10	65	1	3.0	11.9	14.9
000901	1	2	2.508	8	90	1	3.2	6.5	16.2
010203	7	2	2.502	9	57	3	12.5	16.7	4.2
008306	2	2	2.498	9	53	5	5.9	15.2	11.7
000301	2	2	2.498	10	79	1	1.8	3.5	14.1
000202	3	2	2.496	10	70	2	6.1	6.1	9.2
001101	2	2	2.495	10	76	2	6.7	13.4	0.0

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
011001	3	2	2.495	10	100	0	0.0	0.0	9.7
000502	2	2	2.495	9	68	3	5.8	7.7	13.5
011402	2	2	2.491	10	73	1	4.2	16.9	4.2
001203	4	2	2.487	10	91	2	2.6	3.9	3.9
010400	3	2	2.487	9	82	1	11.4	11.4	0.0
000503	3	2	2.484	10	93	3	2.4	3.1	1.6
000203	3	2	2.478	10	72	1	4.6	9.3	9.3
008307	1	2	2.477	9	68	4	7.3	9.1	7.3
010606	3	2	2.477	9	61	6	5.5	9.1	9.1
000401	2	2	2.473	9	72	5	5.7	6.8	6.8
010400	9	2	2.472	9	66	3	5.7	15.3	7.6
001802	5	2	2.469	10	79	1	4.2	16.8	0.0
001003	3	2	2.467	10	74	1	1.9	5.8	13.4
010166	3	2	2.466	9	61	6	4.5	9.0	9.8
001002	1	2	2.464	10	71	2	2.7	5.4	12.2
001004	7	2	2.456	10	70	2	8.3	12.4	0.0
010206	6	2	2.448	8	99	3	2.5	4.2	6.7
008602	3	2	2.445	8	53	8	8.5	14.9	5.3
008501	4	2	2.434	8	56	5	10.5	12.7	8.4
001803	2	2	2.426	10	94	0	0.0	3.6	7.2
001002	3	2	2.423	10	72	1	3.3	6.7	10.0
000304	3	2	2.420	9	85	0	0.0	27.4	0.0
000203	6	2	2.418	10	65	0	0.0	7.7	19.2
001701	2	2	2.418	10	76	1	2.9	5.9	8.8
010137	1	2	2.413	4	71	17	6.0	7.8	6.0
010163	2	2	2.407	8	77	5	4.3	7.7	7.7
010155	3	2	2.406	10	83	1	1.0	3.8	8.6
005902	1	2	2.404	8	80	2	8.1	12.1	4.0
008303	5	2	2.403	10	61	3	4.1	6.8	9.5
000407	3	2	2.400	9	88	2	1.9	5.6	6.5
010155	2	2	2.396	10	86	1	0.8	3.2	7.1
010300	6	2	2.394	8	60	1	2.7	10.8	24.3
000903	2	2	2.387	8	83	3	5.8	7.8	5.8
001003	4	2	2.385	10	90	0	0.0	7.8	3.9
000407	4	2	2.380	9	77	3	2.6	6.9	7.7
010144	2	2	2.378	9	84	2	1.3	1.3	11.5
004702	5	2	2.375	7	63	3	13.3	17.7	4.4

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
001004	5	2	2.374	10	86	0	0.0	0.0	11.4
010205	3	2	2.373	9	67	3	4.5	6.0	10.6
008801	3	2	2.370	7	79	4	5.8	8.6	10.1
001102	3	2	2.369	10	79	0	0.0	20.8	0.0
007701	1	2	2.369	8	63	1	5.7	11.4	17.1
011100	3	2	2.368	9	57	3	4.8	22.6	3.2
009016	3	2	2.367	9	69	3	4.6	6.2	9.2
009017	1	2	2.366	9	80	2	2.8	5.5	8.3
000201	1	2	2.366	10	76	2	5.0	5.0	2.5
008305	2	2	2.362	9	56	6	4.7	6.3	9.5
000901	7	2	2.354	8	78	3	5.5	7.3	7.3
000302	2	2	2.349	9	65	1	5.3	10.6	10.6
010141	1	2	2.347	8	83	4	2.1	3.6	9.4
008601	2	2	2.344	8	69	3	5.1	10.2	10.2
001202	3	2	2.341	8	84	1	1.8	12.4	8.8
001803	1	2	2.339	10	96	0	0.0	5.7	0.0
008304	3	2	2.338	10	68	4	3.4	4.3	3.4
000406	4	2	2.335	9	82	2	5.1	5.1	2.6
000301	1	2	2.333	10	79	1	1.9	9.5	1.9
000902	1	2	2.333	9	79	0	0.0	12.6	9.4
008307	3	2	2.327	9	61	3	3.6	7.2	12.0
010156	1	2	2.320	9	77	4	2.5	3.1	5.6
000901	5	2	2.319	8	77	2	5.9	5.9	8.9
000305	1	2	2.313	10	67	1	2.4	11.8	4.7
010005	6	2	2.304	9	59	3	6.4	12.8	4.3
000204	2	2	2.301	9	77	0	0.0	25.3	0.0
009014	1	2	2.298	8	74	4	3.8	10.3	4.7
000209	2	2	2.297	9	69	0	0.0	0.0	22.2
008411	4	2	2.296	9	83	4	2.3	2.3	1.7
010704	2	2	2.293	10	100	0	0.0	0.0	0.0
010704	2	2	2.293	10	100	0	0.0	0.0	0.0
000404	2	2	2.291	9	70	1	4.1	8.3	8.3
000902	3	2	2.290	9	68	0	0.0	6.0	18.1
000115	1	2	2.289	9	100	0	0.0	0.0	5.4
010130	1	2	2.289	7	62	2	9.7	14.6	9.7
010500	1	2	2.288	10	100	0	0.0	0.0	0.0
000205	3	2	2.285	10	79	1	1.0	3.1	5.2

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
008303	6	2	2.283	10	72	2	4.2	4.2	2.1
010155	1	2	2.283	10	91	0	0.0	1.2	3.5
000503	1	2	2.283	10	90	0	0.0	0.0	4.8
010145	2	3	2.281	8	61	4	3.0	6.7	14.8
000203	2	3	2.281	10	88	0	0.0	1.5	4.5
009702	9	3	2.280	10	99	0	0.0	0.0	0.0
008601	3	3	2.279	8	57	3	4.1	8.1	16.3
000406	3	3	2.275	9	78	1	3.1	6.1	6.1
007200	4	3	2.274	10	98	0	0.0	0.0	0.0
009008	3	3	2.273	9	62	6	2.1	4.5	6.6
011402	1	3	2.265	10	91	0	0.0	0.0	3.5
010400	2	3	2.260	9	92	0	0.0	0.0	8.2
000404	4	3	2.260	9	78	2	1.8	5.3	5.3
000407	5	3	2.259	9	89	1	2.9	5.9	0.0
000404	1	3	2.255	9	68	2	6.8	6.8	3.4
008304	2	3	2.254	10	69	1	1.3	6.3	6.3
010206	2	3	2.253	8	74	0	0.0	0.0	23.4
000401	3	3	2.252	9	85	1	4.7	4.7	0.0
001006	2	3	2.245	10	87	0	0.0	2.8	2.8
010166	1	3	2.244	9	57	5	3.2	6.4	7.0
008304	1	3	2.239	10	60	2	3.2	7.9	4.8
000210	4	3	2.231	10	94	0	0.0	0.0	0.0
011001	3	3	2.230	10	94	0	0.0	0.0	0.0
000203	1	3	2.227	10	51	1	3.8	11.5	7.7
000301	4	3	2.227	10	63	1	3.2	9.7	3.2
000203	5	3	2.226	10	53	1	2.9	5.9	11.8
000202	4	3	2.223	10	68	1	2.4	2.4	7.1
010205	1	3	2.223	9	68	1	3.3	13.3	3.3
001004	8	3	2.222	10	94	0	0.0	0.0	0.0
006002	4	3	2.215	8	68	4	4.5	11.2	2.2
000401	5	3	2.212	9	90	0	0.0	0.0	6.9
000401	4	3	2.208	9	80	1	3.8	7.7	0.0
005901	1	3	2.207	8	62	1	3.7	7.5	15.0
001701	5	3	2.206	10	92	0	0.0	0.0	0.0
005904	4	3	2.203	7	76	2	5.7	11.3	5.7
009802	2	3	2.202	9	64	4	2.0	6.0	5.0
000210	1	3	2.200	10	83	0	0.0	0.0	4.5

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
001006	4	3	2.200	10	75	0	0.0	0.0	8.7
006002	2	3	2.196	8	52	2	7.3	10.9	10.9
000304	5	3	2.190	9	85	0	0.0	0.0	8.8
000403	4	3	2.186	10	90	0	0.0	0.0	0.0
000115	3	3	2.184	9	73	1	4.3	4.3	4.3
005902	3	3	2.180	8	79	1	3.0	3.0	9.1
000405	3	3	2.176	9	100	0	0.0	0.0	0.0
000406	3	3	2.176	9	100	0	0.0	0.0	0.0
001301	5	3	2.176	9	100	0	0.0	0.0	0.0
002401	5	3	2.176	9	100	0	0.0	0.0	0.0
004800	1	3	2.176	9	100	0	0.0	0.0	0.0
010400	3	3	2.176	9	100	0	0.0	0.0	0.0
010602	9	3	2.176	9	100	0	0.0	0.0	0.0
011401	1	3	2.176	9	100	0	0.0	0.0	0.0
011401	3	3	2.176	9	100	0	0.0	0.0	0.0
007603	2	3	2.169	10	89	0	0.0	0.0	0.0
000406	5	3	2.169	9	84	0	0.0	5.8	3.9
008801	1	3	2.168	7	59	3	6.7	6.7	13.4
000109	1	3	2.166	9	81	1	1.5	1.5	4.5
010201	9	3	2.166	7	59	4	4.5	14.7	7.9
001803	6	3	2.163	10	88	0	0.0	0.0	0.0
000901	6	3	2.159	8	77	1	3.0	3.0	9.0
010150	2	3	2.149	7	84	4	3.3	3.3	3.3
000901	3	3	2.147	8	71	1	6.6	13.2	0.0
008804	1	3	2.141	8	56	2	6.0	9.0	9.0
001801	3	3	2.141	10	86	0	0.0	0.0	0.0
010153	1	3	2.141	7	51	7	6.0	10.2	6.0
000205	4	3	2.141	10	77	0	0.0	6.8	0.0
000405	1	3	2.137	9	97	0	0.0	0.0	0.0
001004	3	3	2.137	10	83	0	0.0	2.3	0.0
008700	4	3	2.135	8	66	1	2.8	11.0	8.3
011402	5	3	2.134	10	86	0	0.0	0.0	0.0
010156	3	3	2.128	9	69	1	2.2	4.3	6.5
010201	6	3	2.125	7	57	2	6.3	9.5	12.7
001005	1	3	2.121	9	71	2	2.6	3.8	2.6
005901	3	3	2.117	8	71	2	2.9	8.7	4.3
010148	1	3	2.115	7	85	1	4.8	4.8	4.8



**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
010143	1	3	2.112	8	57	2	2.9	7.2	12.9
010005	8	3	2.107	9	62	1	1.8	7.2	7.2
000304	8	3	2.107	9	72	0	0.0	0.0	11.5
010500	4	3	2.105	10	77	0	0.0	4.9	0.0
009016	2	3	2.104	9	82	0	0.0	0.0	6.0
000902	5	3	2.097	9	67	1	2.4	2.4	7.2
005600	1	3	2.097	8	54	1	4.1	20.7	4.1
009017	3	3	2.094	9	93	0	0.0	0.0	0.0
000301	3	3	2.094	10	63	0	0.0	4.7	7.0
010114	2	3	2.093	8	77	0	0.0	5.2	10.3
000901	4	3	2.090	8	74	0	0.0	0.0	15.4
010206	5	3	2.084	8	91	1	2.0	2.0	0.0
010148	2	3	2.074	7	63	2	4.0	12.1	8.0
009600	2	3	2.072	8	79	2	3.1	3.1	1.6
010206	4	3	2.070	8	94	0	0.0	0.8	3.4
009013	1	3	2.069	7	79	4	2.1	3.1	4.2
000203	4	3	2.065	10	80	0	0.0	0.0	0.0
010602	9	3	2.064	9	90	0	0.0	0.0	0.0
005904	4	3	2.061	7	66	0	0.0	0.0	23.8
009100	5	3	2.058	8	100	0	0.0	0.0	0.0
000115	5	3	2.058	9	69	3	1.1	1.8	1.8
000306	1	3	2.056	10	71	0	0.0	0.0	4.4
010001	9	3	2.056	10	79	0	0.0	0.0	0.0
001104	4	3	2.055	8	74	0	0.0	0.0	13.9
008700	1	3	2.055	8	55	4	6.9	6.9	1.7
001104	4	3	2.054	8	51	0	0.0	5.5	22.0
009200	3	3	2.054	8	68	1	7.5	7.5	0.0
009100	1	3	2.041	8	79	2	1.2	4.3	1.8
009012	2	3	2.039	8	74	4	0.8	1.2	2.7
009013	3	3	2.038	7	90	1	0.9	4.5	3.6
010176	2	3	2.036	8	63	5	3.1	3.7	1.8
001703	3	3	2.031	9	87	0	0.0	0.0	0.0
009017	3	3	2.030	9	87	0	0.0	0.0	0.0
008501	5	3	2.030	8	54	2	4.5	9.0	6.7
007803	3	3	2.026	8	69	4	1.3	1.6	3.9
009006	1	3	2.025	8	67	3	0.9	3.4	6.0
008412	1	3	2.025	10	62	2	0.8	1.1	1.5

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
001204	1	3	2.025	10	52	1	0.9	5.1	6.0
009802	1	3	2.024	9	64	2	1.4	3.5	3.5
007603	1	3	2.022	10	69	0	0.0	0.0	3.6
008804	2	3	2.013	8	73	1	1.1	7.6	3.3
010005	7	3	2.012	9	72	1	1.7	1.7	1.7
010160	3	3	2.011	7	68	4	4.5	5.6	2.3
007603	2	3	2.009	10	75	0	0.0	0.0	0.0
005904	2	3	2.008	7	65	2	5.7	14.2	0.0
009011	1	3	2.008	8	68	3	2.2	3.0	3.7
009016	1	3	2.007	9	85	0	0.0	0.0	0.0
009801	3	3	1.999	9	71	1	0.7	2.0	2.7
000401	7	3	1.990	9	82	0	0.0	0.0	0.8
008804	4	3	1.986	8	68	1	2.3	2.3	6.9
009017	2	3	1.981	9	83	0	0.0	0.0	0.0
000408	2	3	1.979	10	72	0	0.0	0.0	0.0
009014	2	3	1.978	8	64	2	4.0	6.0	2.0
010143	2	3	1.977	8	93	0	0.0	0.0	0.0
003802	3	3	1.971	8	61	3	3.4	3.4	3.4
010147	1	3	1.971	8	57	3	4.3	4.3	4.3
000903	4	3	1.970	8	92	0	0.0	0.0	0.0
010161	4	3	1.959	7	71	2	2.5	7.5	3.8
000405	4	3	1.958	9	69	0	0.0	0.0	6.3
009010	1	3	1.958	7	54	6	3.6	5.4	4.2
008411	3	3	1.958	9	65	1	1.1	2.2	3.2
000903	1	3	1.955	8	91	0	0.0	0.0	0.0
009304	3	3	1.951	7	65	2	2.9	5.9	7.3
010158	4	3	1.951	7	59	3	3.0	6.0	8.1
000203	2	4	1.947	10	67	0	0.0	0.0	1.1
000111	1	4	1.946	7	62	4	2.5	3.8	6.3
010168	1	4	1.945	8	60	4	2.7	3.3	2.0
009010	2	4	1.940	7	100	0	0.0	0.0	0.0
009019	2	4	1.940	7	100	0	0.0	0.0	0.0
008501	1	4	1.936	8	58	1	4.9	4.9	4.9
005904	3	4	1.935	7	59	1	7.1	14.3	0.0
010154	1	4	1.934	6	63	3	4.7	4.7	9.4
000115	4	4	1.934	9	71	0	0.0	0.0	3.9
007702	1	4	1.933	7	99	0	0.0	0.0	0.0

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
008700	2	4	1.932	8	53	1	1.9	3.9	11.6
008801	2	4	1.925	7	77	1	0.9	9.5	1.7
007701	5	4	1.923	8	55	2	4.9	9.8	0.0
007701	6	4	1.922	8	57	1	2.5	5.0	7.5
001703	1	4	1.922	9	77	0	0.0	0.0	0.0
000703	6	4	1.921	8	88	0	0.0	0.0	0.0
010704	1	4	1.919	10	66	0	0.0	0.0	0.0
006200	6	4	1.916	7	66	1	2.3	13.7	2.3
010605	1	4	1.909	9	76	0	0.0	0.0	0.0
000403	2	4	1.903	10	65	0	0.0	0.0	0.0
009802	4	4	1.900	9	70	0	0.0	0.7	2.2
009018	2	4	1.894	6	92	1	1.9	1.9	1.9
009011	2	4	1.894	8	81	0	0.0	0.0	2.1
000114	3	4	1.891	8	85	0	0.0	0.0	0.0
010142	3	4	1.890	9	56	1	2.0	2.0	3.9
005903	3	4	1.888	7	67	2	5.4	5.4	0.0
001104	5	4	1.886	8	75	0	0.0	2.9	2.9
004703	3	4	1.884	8	71	1	0.9	2.8	1.9
010300	5	4	1.880	8	67	1	1.1	3.2	3.2
007701	4	4	1.877	8	73	0	0.0	0.0	5.6
000301	5	4	1.875	10	60	0	0.0	0.0	1.6
009600	1	4	1.875	8	65	2	1.5	3.0	1.5
010163	1	4	1.873	8	64	2	1.5	3.0	2.3
009018	4	4	1.871	6	87	1	1.4	1.4	4.3
010150	1	4	1.871	7	69	3	2.3	2.3	2.3
008804	5	4	1.870	8	58	1	2.0	4.0	6.0
006200	1	4	1.858	7	68	3	1.3	2.2	3.5
006200	3	4	1.857	7	52	1	3.8	15.3	3.8
010133	2	4	1.854	6	61	4	3.3	7.5	4.2
005904	3	4	1.852	7	56	1	4.3	4.3	8.7
010162	2	4	1.849	8	67	1	1.5	3.0	1.5
010129	2	4	1.848	7	92	0	0.0	0.0	0.0
010160	4	4	1.842	7	73	1	1.3	2.7	4.0
010178	1	4	1.839	6	52	7	2.5	5.3	5.0
010164	3	4	1.838	9	67	0	0.0	0.0	1.2
010154	3	4	1.833	6	71	2	3.5	5.2	3.5
010158	2	4	1.832	7	56	2	3.3	4.9	6.5

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
008901	1	4	1.831	7	59	1	2.7	8.0	5.4
003801	1	4	1.831	8	60	1	0.6	1.9	6.2
000201	9	4	1.831	10	59	0	0.0	0.0	0.0
010169	1	4	1.828	7	65	2	0.8	3.0	5.9
009015	1	4	1.827	9	53	0	0.0	4.9	4.9
009012	1	4	1.826	8	79	0	0.0	0.0	0.0
010158	3	4	1.824	7	73	1	1.0	2.0	4.0
005902	2	4	1.824	8	79	0	0.0	0.0	0.0
010133	2	4	1.823	6	100	0	0.0	0.0	0.0
009017	2	4	1.818	9	68	0	0.0	0.0	0.0
000108	1	4	1.814	8	62	2	0.6	0.8	3.4
011500	4	4	1.813	1	56	4	12.4	24.8	9.3
008902	3	4	1.804	7	66	2	2.2	3.3	2.2
010154	4	4	1.804	6	55	2	2.5	6.3	11.3
010159	2	4	1.800	9	61	0	0.0	0.0	3.1
003801	3	4	1.794	8	69	0	0.0	0.0	4.0
008905	3	4	1.791	7	68	2	0.8	2.1	3.3
009011	3	4	1.781	8	74	0	0.0	0.0	0.7
005904	2	4	1.778	7	69	0	0.0	11.8	0.0
000203	6	4	1.776	10	54	0	0.0	0.0	0.0
008803	2	4	1.774	6	61	3	4.2	5.5	2.8
007602	5	4	1.772	7	65	2	1.2	2.9	2.9
007602	1	4	1.770	7	61	1	3.9	7.8	0.0
005901	2	4	1.769	8	62	0	0.0	2.3	4.6
007604	3	4	1.768	7	81	0	0.0	0.0	1.9
000209	1	4	1.763	9	63	0	0.0	0.0	0.0
008902	1	4	1.763	7	59	2	1.8	5.5	2.7
008803	1	4	1.762	6	68	0	0.0	4.4	11.0
004701	2	4	1.760	5	51	4	6.4	8.0	6.4
005903	2	4	1.760	7	79	0	0.0	0.0	2.5
010145	1	4	1.753	8	58	2	2.0	2.0	0.0
006200	6	4	1.746	8	70	0	0.0	1.3	0.0
010161	2	4	1.743	7	66	0	0.0	3.6	5.9
010158	1	4	1.738	7	53	1	2.3	4.7	7.0
010162	1	4	1.737	8	69	0	0.0	0.0	1.3
000204	2	4	1.737	9	61	0	0.0	0.0	0.0
010159	3	4	1.730	9	53	0	0.0	1.4	2.8

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction****Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
004702	6	4	1.728	7	61	0	0.0	8.6	4.3
005903	1	4	1.722	7	79	0	0.0	1.1	0.0
009100	9	4	1.719	8	70	0	0.0	0.0	0.0
009018	3	4	1.712	6	90	0	0.0	0.0	0.0
010400	9	4	1.709	9	58	0	0.0	0.0	0.0
005902	4	4	1.705	8	62	0	0.0	0.0	3.4
008204	2	4	1.704	9	58	0	0.0	0.0	0.0
009311	2	4	1.700	8	68	0	0.0	0.0	0.0
000903	3	4	1.686	8	67	0	0.0	0.0	0.0
010161	1	4	1.684	7	54	1	1.8	3.6	5.3
010147	3	4	1.684	8	67	0	0.0	0.0	0.0
007601	1	4	1.683	6	76	0	0.0	8.3	0.0
009013	2	4	1.678	7	65	0	0.0	0.0	6.2
009018	1	4	1.677	6	87	0	0.0	0.0	0.0
006200	2	4	1.674	7	63	1	0.9	3.7	0.9
007604	3	4	1.662	7	75	0	0.0	0.0	0.0
010161	3	4	1.652	7	62	0	0.0	1.8	5.3
004702	3	4	1.648	7	54	0	0.0	3.8	7.6
009019	2	4	1.646	7	60	0	0.0	1.9	5.7
005904	1	4	1.631	7	65	0	0.0	5.2	0.0
010167	1	4	1.626	7	58	1	0.5	2.7	2.7
009019	1	4	1.626	7	53	1	1.4	2.7	4.1
007400	2	4	1.623	5	57	1	4.6	9.1	4.6
008905	1	4	1.610	7	54	0	0.0	1.2	8.1
008413	2	4	1.608	7	60	0	0.0	0.4	5.1
000108	1	4	1.606	8	60	0	0.0	0.0	0.0
009304	2	4	1.606	7	52	3	1.1	2.3	0.4
004702	2	4	1.596	7	66	0	0.0	0.0	1.5
010124	4	4	1.587	8	58	0	0.0	0.0	0.0
009304	3	4	1.581	7	68	0	0.0	0.0	0.0
008901	2	4	1.570	7	55	0	0.0	2.3	4.7
006200	4	4	1.540	7	51	1	1.1	3.2	1.1
008901	5	4	1.538	7	57	0	0.0	1.5	2.9
010149	1	4	1.528	6	74	0	0.0	0.0	0.0
010177	1	4	1.528	7	57	0	0.0	0.7	2.8
007604	1	4	1.525	7	59	0	0.0	2.7	0.0
008801	4	4	1.499	7	57	0	0.0	0.0	2.0

**Table A-3. Areas of Greatest Need: Miami-Dade County Jurisdiction**  
**Grouped by Priority Level**

Source: U.S. Department of Housing and Urban Development special tabulations; Miami-Dade County Department of Planning & Zoning, Research Section; Office of Economic Development Coordination; November 2008.

Census Tract	Block Group	Priority Level	IGN Index	HUD Risk Factor	Pct Persons Earning < 120% AMI	REOs, May August	Fore-closure Rate, 4m X-units per 1000	Fore-closure Rate, 10m X-units per 1000	Lis Pendens Rate X-units per 1000
008407	2	4	1.477	7	55	0	0.0	0.9	0.9
010149	3	4	1.475	6	69	0	0.0	0.0	0.0
010175	1	4	1.461	7	52	0	0.0	0.0	2.9
004702	1	4	1.452	7	52	0	0.0	1.4	1.4
008100	1	4	1.448	4	88	0	0.0	0.0	0.0
007602	5	4	1.404	7	52	0	0.0	0.0	0.0
010149	2	4	1.401	6	62	0	0.0	0.0	0.0
004602	3	4	1.370	4	81	0	0.0	0.0	0.0

## ***B. DISTRIBUTION AND USES OF FUNDS***

Provide a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures. **Note:** The grantee's narrative must address these three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

### **Response:**

Miami-Dade County's proposed NSP contains six eligible activities (not including general administration) that will receive funding. The following activities are labeled according to their corresponding eligible use as referenced in the Housing and Economic Recovery Act of 2008.

- Eligible Activity A – Second mortgage assistance for income eligible homebuyers, and associated homebuyer counseling;
- Eligible Activity B-1 – Single family residential acquisition and rehab for resale and associated homebuyer counseling;
- Eligible Activity B-2 – Acquisition and rehab of foreclosed upon multi-family residential for affordable rental housing;
- Eligible Activity D – Demolition of blighted structures; and
- Eligible Activity E-1 – Redevelopment of vacant properties for affordable multi-family rental housing in the Scott Carver HOPE VI site; and
- Eligible Activity E-2 – Redevelopment of vacant properties for affordable multi-family rental housing in the Expanded HOPE VI area.

Eligible Activity A will provide second mortgage financing assistance to purchasers of foreclosed upon single family homes only in areas that have been designated *highest priority*, *high priority*, *moderate priority* and *priority* as defined in Section A of this substantial amendment to the consolidated plan.

Eligible Activities B-1, B-2, D, E-1 and E-2 will be executed only in areas designated *highest priority* and *high priority*.

No NSP funds, however, will be used for NSP activities outside the County's Urban Development Boundaries.

The methodology used to identify the areas of greatest need and the priority rankings described in Section A of this consolidated plan amendment gives explicit priority emphasis to areas with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures. The Index of Greatest Need (IGN) defined in Section A provides a significant role for the rate of foreclosures (foreclosures per total number of housing units in the census block group) in determining the priority ranking of any particular block

group. The IGN also includes HUD's foreclosure risk score, which is, in part, determined by the Federal Reserve HMDA data on the percentage of high cost mortgages – an accepted indicator of the percentage of subprime related loans. The percentage of subprime related mortgages is, therefore, a component of the IGN and a determining factor in the distribution and uses of NSP funds in Miami-Dade County's proposed plan amendment. The IGN also gives consideration of an area's likelihood of a significant increase in foreclosure activity through use of the number of recently filed *lis pendens* as a proportion an area's existing housing units, as well as the HUD foreclosure risk score.



**C. DEFINITIONS AND DESCRIPTIONS**

**(1) Definition of “blighted structure” in context of state or local law.**

**Response:**

Miami-Dade County adopts the definition of “uninhabitable structures” as defined in Section 17B-15 of the Miami-Dade County Code of Ordinances, as the definition of “blighted structures” for purposes of this NSP Substantial Amendment.<sup>1</sup> A structure shall be deemed “blighted” and subject to demolition when:

- (a) It is visited by persons for the purpose of unlawfully procuring or using any controlled substance, as defined under Chapter 893 of the Florida Statutes, or any drugs, as defined in Chapter 499 of the Florida Statutes; or
- (b) It is used for the illegal keeping, selling or delivering of such controlled substances or drugs; and
- (c) The structure is found to have one (1) or more of the following characteristics:
  - (i) It is vacant, unguarded and open at doors or windows,
  - (ii) There is an unwarranted accumulation of debris or other combustible material therein,
  - (iii) The structure's condition creates hazards with respect to means of egress and fire protection as provided for the particular occupancy,
  - (iv) There is a falling away, hanging loose or loosening of any siding, block, brick, or other building material,
  - (v) There is deterioration of the structure or structural parts,
  - (vi) The structure is partially destroyed,
  - (vii) There is an unusual sagging or leaning out of plumb of the structure or any parts of the structure and such effect is caused by deterioration or over-stressing,
  - (viii) The electrical or mechanical installations or systems create a hazardous condition, or
  - (ix) An unsanitary condition exists by reason of inadequate or malfunctioning sanitary facilities or waste disposal systems.

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<sup>1</sup> The term “blighted structure” does not appear in Section 17B-15 of the Miami-Dade County Code of Ordinances. However, Chapter 17B (METROPOLITAN MIAMI-DADE COUNTY DEMOLITION OF UNINHABITABLE STRUCTURES ORDINANCE) was adopted on the basis of the Board of County Commissioners’ legislative findings that “in recent years and at present an increased number of uninhabitable structures exist, the maintenance of which is often neglected by the owners thereof. It is furthermore found and declared by this Board that said structures often become open, unsecured, vandalized, or used for illicit purposes by trespassers, resulting in conditions that are unhealthy, unsafe, unsightly, and a blight upon the neighborhood and community at large, and that the demolition of uninhabitable structures will improve the security and quality of life in general of persons living nearby, will prevent blight and decay, and will safeguard the public health, safety, morals and welfare.”

A structure shall be presumed to be utilized for the purpose set forth in (1)(a) or (b) above when there are one (1) or more arrests or police reports of incidents which involve the keeping, consumption, or delivery of controlled substances or drugs on the premises of the subject structure during the period of six (6) months preceding the posting of notice by the Minimum Housing Enforcement Officer.

In the administration of the demolition activity outlined in this Plan and when the code above does not meet the required standard for demolition Miami-Dade County will use the code Section 8.5 for “unsafe structures” and it is as follows:

- (2) Buildings or structures that are, or hereafter shall become, unsafe, unsanitary or deficient, facilities with inadequate means of egress, or which constitute a fire or windstorm hazard, or are otherwise dangerous to human life or public welfare by reason of illegal or improper use, occupancy or maintenance, or which have been substantially damaged by the elements, acts of God, fire, explosion or otherwise, shall be deemed unsafe structures and a permit shall be obtained to demolish the structure or where specifically allowed by this section, to bring the building into compliance with the applicable codes as provided herein.
  - (3) Incomplete buildings commenced without a permit or for which the permit has expired, or completed buildings commenced without a permit or for which the permit has expired, prior to completion and no Certificate of Occupancy has been issued, shall be presumed and deemed unsafe and a permit shall be obtained to demolish the structure or bring the building into compliance with the applicable codes as provided herein.
  - (4) Buildings which meet the physical criteria of unsafe structures set forth in this section, and are ordered to be repaired by the Building Official, an Unsafe Structures Appeal Panel or the Unsafe Structures Board, in the manner more particularly set forth below, which are not completed or repaired and brought into full compliance with the Building Code within the reasonable time allowed by the Building Official or the Unsafe Structures Board, will be demolished.
  - (5) Swimming pools that contain stagnant water are deemed unsanitary and dangerous to human life and public welfare. If the stagnant water is not removed and all repairs made and brought into full compliance with the Building Code within the reasonable time allowed by the Building Official, then these swimming pools will be demolished.
  - (6) Buildings or structures subject to the recertification requirements in Section 8-11(f) of this Code which the owner fails to timely respond to the Notice of Required Inspection or fails to make all required repairs or modifications found to be necessary resulting from the recertification inspection by the deadline specified in the Code or any written extension granted by the Building Official will be demolished.
- (b) *Physical criteria.*
- (1) A building shall be deemed a fire hazard and/or unsafe when:
    - (i) It is vacant, unguarded and open at doors or windows.
    - (ii) There is an accumulation of debris or other material therein representing a hazard of combustion.

- (iii) The building condition creates hazards with respect to means of egress and fire protection as provided herein for the particular Occupancy.
- (2) A building, or part thereof, shall be presumed to be unsafe if:
  - (i) There is a falling away, hanging loose or loosening of any siding, block, brick, or other building material.
  - (ii) There is a deterioration of the structure or structural parts.
  - (iii) The building is partially destroyed.
  - (iv) There is an unusual sagging or leaning out of plumb of the building or any parts of the building and such effect is caused by deterioration or over-stressing.
  - (v) The electrical or mechanical installations or systems create a hazardous condition contrary to the standards of the Building Code.
  - (vi) An unsanitary condition exists by reason of inadequate or malfunctioning sanitary facilities or waste disposal systems.
  - (vii) By reasons of use or occupancy the area, height, type of construction, fire-resistivity, means of egress, electrical equipment, plumbing, air conditioning or other features regulated by this Code do not comply with this Code for the use and group of occupancy.
- (3) A building, or part thereof, shall be presumed to be unsafe if:
  - (i) The construction, installation of electrical, plumbing or other equipment therein or thereon, or the partial construction or installation of electrical, plumbing or other equipment has been commenced or completed without a permit therefore having been obtained or where the permit has expired prior to completion and the issuance of a Certificate of Occupancy or Certificate of Completion.
  - (ii) The construction, installation of electrical, plumbing or other equipment therein or thereon, or the partial construction or installation of electrical, plumbing or other equipment has not been completed.
  - (iii) The building or structure is vacant and abandoned, and covered at doors or windows with materials not previously approved by the Building Official, or for a period exceeding the maximum limitations set forth in this Section.
  - (iv) By reason of illegal or improper use, occupancy or maintenance does not comply with the Building Code, or the code in effect at the time of construction.
  - (v) The building or part thereof meets the physical criteria of an unsafe structure set forth above and has not been repaired and brought into compliance with the Building Code following the expiration of the reasonable periods allowed by the Building Official, an Unsafe Structures Appeal Panel or the Unsafe Structures Board for such repairs.

For the purposes of the NSP, a blighted structure echoes the criteria for slum and blight found in Florida Statutes Chapter 163.340, which outlines the following conditions:

1. Building deterioration
2. Site deterioration or site deficiencies
3. Unsanitary and unsafe conditions and incompatible uses
4. Six or more ownership parcels per block
5. Buildings greater than 40 years of age
6. Presence of closed/vacant buildings

7. Presence of vacant lots
8. Buildings in violation of property maintenance code violations
9. Presence of buildings scheduled for demolition

A blighted structure will meet one or more of the aforementioned criteria.

- (2) **Definition of “affordable rents.”** *Note:* Grantees may use the definition they have adopted for their CDBG program but should review their existing definition to ensure compliance with NSP program –specific requirements such as continued affordability.

**Response:**

Miami-Dade County will adopt the maximum rents allowed as determined by market comparison. The County will set rents at thirty (30) percent of monthly gross income, not to exceed the maximum market rent. Alternatively, maximum rents may be based on HUD-approved rent limits for tax credit projects.

- (3) **Describe how the grantee will ensure continued affordability for NSP assisted housing.**

**Response:**

**Homeownership Units**

All home purchases assisted with NSP-funded soft-second loans shall be subject to affordability controls that currently govern other affordable housing programs administered by Miami-Dade County.

In addition to the second mortgage, a declaration of restrictive covenants running with the land will be recorded in the public records of Miami-Dade County. The declaration of restrictive covenants will specify that:

- (1) The restrictions shall run with the land for the entire control period; and
- (2) The covenants will bind the homebuyer, any assignee, mortgagee, and all other parties that receive title to or interest in the property. These covenants will be senior to all instruments securing permanent financing; and
- (3) The covenants shall control for a minimum of twenty (20) years and shall automatically reset every 20 years for a maximum of 60 years, except that in the event an eligible home is owned for an entire 20-year control period by the same individual(s), said individual(s) shall automatically be released from the Declaration of Restrictive Covenants; and
- (4) Re-sale of the property during the affordability control period is limited to NSP income-qualified individuals or families for use as their primary residence. The assisted home may not be leased to another party; and
- (5) Prior to the re-sale of the NSP-assisted home during the control period, the current

- homeowner shall obtain the County's written approval; and
- (6) The maximum sales price permitted on resale of an eligible home shall be based on a formula established by County ordinance. The maximum sales price is currently based on:
    - (i) a formula that takes into account the price paid by the current owner and any increases tied to an index of area incomes during the period in which the current owner owned the home; and
    - (ii) documented costs for property improvements that are permanent in nature and not for decoration or maintenance purposes; and
  - (7) The County reserves a right of first refusal to purchase the eligible home prior to or at the end of control period, if it becomes available for purchase and there are no eligible persons to purchase the NSP-assisted home.

*Multi-Family Rental Properties:*

Multi-family rental housing properties will be purchased by the County and added to the County's existing affordable rental housing inventory. The County has the ability to access existing contracts to place the management and maintenance of the properties under the care of property management companies providing the same services for other County-owned rental property. The County may also select for-profit and not-for-profit housing developers to acquire, rehabilitate and manage multi-family rental housing.

All rental properties acquired with NSP funds will be subject to the restrictions set forth below to maintain continued affordability:

- (a) units may only be occupied by individuals and households at 120% of median income or less;
  - (b) the number of units that are to be set-aside for certain income groups (i.e. those at or below 50%) must be specified;
  - (c) rents must remain affordable as defined under Part C(2) of this Application; and
  - (d) the term of the affordability shall not be less than thirty years. If acquired by private developers, the properties will be subject to recorded restrictive covenants and rent regulatory agreements that will include the above restrictions to ensure continued affordability.
- (4) **Describe housing rehabilitation standards that will apply to NSP assisted activities.**

**Response:**

Miami-Dade County will apply housing standards set forth in Chapter 17, Article II of the Miami-Dade County Code of Ordinances. No dwelling may be occupied for the purpose of living, sleeping, cooking, or eating therein which does not comply with the following requirements:

### **Minimum standards for dwelling's basic equipment and facilities**

- (1) Every dwelling unit shall contain not less than a kitchen sink, lavatory, tub or shower and water closet, all in good working condition, and installed in accordance with the South Florida Building Code. Sink, lavatory, tub or shower shall be supplied with adequate hot and cold water.
- (2) Every dwelling unit shall contain a room which affords privacy to a person within said room, and which is equipped with a flush water closet and a lavatory basin in good working condition; properly connected to an approved water system and sewer system, or an approved septic tank installation including an approved absorption bed. No privy shall be constructed or continued in operation after the effective date\* of this article.
- (3) Every dwelling unit shall contain a room which affords privacy to a person within said room and which is equipped with a bathtub or shower in good working condition; and properly connected to an approved water system and sewer system or an approved septic tank installation, including an approved absorption bed.
- (4) Every kitchen sink, lavatory basin, and bathtub or shower required under the provisions of this section shall be properly connected with both hot and cold water lines.
- (5) Every dwelling shall have water heating facilities which are properly installed, maintained in safe and good working condition, and properly connected with the hot water lines required under the provisions of subsection (4) of this section; and which are capable of heating water to such a temperature as to permit an adequate amount of water to be drawn at every required kitchen sink, lavatory basin, bathtub or shower.
- (6) Every occupied dwelling unit shall be provided with an installed nonportable cooking facility which shall not be capable of being carried easily by one (1) person, and shall have at least two (2) top burners. Vacant dwelling units shall be provided with utility connections for such facility.
- (7) Every dwelling unit shall have adequate garbage disposal facilities or garbage storage containers.
- (8) Every dwelling structure and dwelling unit of types of Construction I, II, III, IV and V as defined by Chapters 17, 18, 19, 20, 21 and 22 respectively of the South Florida Building Code shall have means of egress which conform to the standards of Chapter 31 of the South Florida Building Code, and any applicable fire codes, fire regulations or ordinances now in existence or adopted subsequent hereto. Every dwelling structure of type of Construction V, built before December 31, 1957, where the structural and other elements of the building consist primarily of wood, having one (1) or two (2) dwelling units above the ground floor, shall have a minimum of two (2) separate means of egress which are remote from each other; or at least one (1) means of egress with stairs that are constructed of either noncombustible materials; or made safe by approved fire resistive modifications as may be required. Each such means of egress shall be easily accessible from every dwelling unit on the specified floor without passing through any other

dwelling unit. Every dwelling structure of type of Construction V, where the structural and other elements consist primarily of wood having three (3) or more dwelling units, shall have means of egress which conform with the provisions of the South Florida Building Code and any applicable fire codes, fire regulations or ordinances now in existence, or adopted subsequent hereto.

- (9) In every owner-occupied dwelling unit not intended to be let for occupancy containing space heating facilities, such facilities shall be properly installed and maintained in safe and good working condition, as provided in the South Florida Building Code and any applicable fire regulations or ordinances now in existence or adopted subsequent hereto.

Every dwelling and dwelling unit which is let or intended to be let for occupancy shall have adequate space heating facilities which are properly installed and maintained in safe and good working condition, as provided in the South Florida Building Code and any applicable fire regulations or ordinances now in existence or adopted subsequent hereto. Adequate heating facilities are hereby defined as follows:

- (a) Permanent space heating equipment capable of heating two-thirds of the habitable rooms to a minimum air temperature of seventy (70) degrees Fahrenheit to be measured three (3) feet above floor when outside temperature is forty-five (45) degrees Fahrenheit, or permanent space heating equipment with capacity of five (5) Btu's per hour of input per cubic foot of habitable room space within two-thirds (  $2/3$ ) of the habitable rooms.
- (b) The five (5) Btu's per hour input standard is based on a heating unit with seventy (70) percent rating of input-to-output efficiency; an appropriate correction factor will be applied when the proposed heating unit exceeds an input-to-output efficiency rating of seventy (70) percent. Heating units supplied on the basis of this calculation will otherwise comply with the standards described elsewhere in this subsection.
- (c) Permanent heating equipment is defined as heating equipment properly connected to a flue or vent or, if electric, properly installed and permanently connected to an adequately wired and sized branch circuit.
- (d) Habitable room shall mean a room or enclosed floor space used or intended to be used for living, sleeping, cooking or eating purposes, excluding bathrooms, shower rooms, water closet compartments, laundries, pantries, foyers, connecting corridors, closets and storage spaces.
- (e) Heating equipment shall be installed and maintained in accordance with the provisions of the South Florida Building Code.
- (f) Any calculations necessary for the installation of permanent heating

equipment to assure adequate heating capacity as defined in this subsection, shall be made in accordance with the standards established in the current edition of the "Heating Ventilating Air-Conditioning Guide," published by the American Society of Refrigeration, Heating and Air-Conditioning Engineers, Inc. (ASHRAE).

- (g) Oil heaters, gas heaters, and wood-stoves must be connected to a properly installed vent, said vent conforming to the provisions of the South Florida Building Code.
- (h) Electric heaters will be of a type readily fixed into position and must be properly installed and permanently connected to an adequately wired and sized branch-circuit.
- (i) Any portable heating devices approved by the Underwriters' Laboratories, Inc., or a properly installed fireplace may be used as an accessory heating unit.
- (j) Accessory heating units will be deemed to be supplementary to the permanent-heating equipment and shall not be considered when calculating the adequacy of the permanently installed heating equipment except as specified in subsection (9)(m).
- (k) Only those accessory heating units which are acceptable under the provisions of the City of Miami and Miami-Dade County Fire Code, the Florida State Hotel and Restaurant Commission regulations, and other regularly adopted regulations will be used.
- (l) The use of unsafe heaters or cooking stoves and the use of cooking stoves, including ovens, for heating purposes is hereby prohibited.
- (m) The requirements of subsection (9) shall not apply to dwelling units in existence on March 17, 1969, provided that either a gas pipe outlet or an electrical outlet and circuit are present for the use of gas space heaters or portable electrical space heaters.

**Minimum standards for light and ventilation.**

- (1) (a) Every habitable room shall have at least one (1) window or skylight facing directly to the outdoors. The minimum total window area which provides light to each habitable room shall be not less than ten (10) percent of the floor area of such room. Whenever exterior walls or other light-obstructing structures are located less than three (3) feet from the window and extend above the ceiling of the room, such a window shall not be deemed to face directly to the outdoors and shall not be included in the required minimum total window area. Whenever the only window in a



room is a skylight-type window located in the top of such room, the minimum total window area of such skylight shall not be less than fifteen (15) percent of the total floor area of the room. Skylights shall not be a substitute for the window requirements in sleeping rooms.

- (b) Kitchens and dining rooms will be exempt from the requirements of subsection (1)(a) of this section, providing they meet the requirements in subsections (2) and (6) of this section.
- (c) If any two (2) habitable rooms, excluding sleeping rooms, are separated by a common wall and either room lacks the required window area, but meets all three (3) exceptions listed below, such rooms shall be considered in compliance with this subsection:
  - (i) The common wall separating the two (2) rooms must provide an opening equal to twenty-five (25) percent of the total wall area.
  - (ii) If the opening so provided is a doorway, it must be unobstructed and have a minimum width of thirty (30) inches.
  - (iii) One (1) of the two (2) rooms must provide the required light and ventilation for the total combined floor area of the two (2) rooms.
- (2) Every habitable room shall be ventilated by openable areas equal to fifty (50) percent of the required minimum window area, as set forth in subsection (1) of this section or by equivalent mechanical ventilation as approved by the inspecting officer.
- (3) Every bathroom, shower room and water closet compartment shall comply with the light and ventilation requirements for habitable rooms contained in subsections (1) and (2) of this section, except that no window or skylight shall be required in adequately ventilated bathrooms, shower rooms and water closet compartments equipped with an approved mechanical ventilating system which automatically becomes operational when the bathroom switch is turned on.
- (4) Every door, window or other device opening to outdoor space and used or intended to be used for ventilation shall be provided with an approved type of screen for protection against mosquitoes, flies and other insects.
- (5) Every opening beneath a dwelling, including basement or cellar windows and crawl space, shall be equipped with an approved type of screening or lattice work to keep out large animals.
- (6) Every habitable room of a dwelling shall contain at least two (2) separate floor or wall-type electrical convenience outlets, or one (1) such convenience outlet and one (1) ceiling-type electric light fixture. Every bathroom, shower room, water closet, compartment and laundry room shall contain at least one (1) properly installed ceiling or wall-type electric light fixture. The switches shall be so located and installed as to avoid the danger of electrical shock.
- (7) Every hall and stairway located in a structure used for human habitation shall be provided with not less than one (1) foot-candle of natural light throughout or with

properly installed electric lighting facilities which provide not less than one (1) foot-candle of illumination throughout and which are controlled by the occupants of the structure and available at all times.

**Requirements relating to the safe and sanitary maintenance of dwellings and dwelling units.**

- (1) All foundation walls shall be structurally sound, reasonably rodent proof, and maintained in good repair. Foundation walls shall be considered to be sound if they are capable of bearing imposed loads and are not deteriorated.
- (2) Every dwelling unit shall be reasonably weather tight, watertight and rodent proof. Floors, walls, ceilings and roofs shall be capable of affording adequate shelter and privacy and shall be kept in good repair. Windows and exterior doors shall be reasonably weather tight, watertight, and rodent proof, and shall be maintained in good working condition. All parts of the structure that show evidence of rot or other deterioration shall be repaired or replaced.
- (3) Every inside and outside stairway, porch, and every appurtenance thereto, shall be maintained in a safe condition and be capable of supporting loads which normal use may impose.
- (4) Every chimney and smoke pipe, and all flue and vent attachments thereto, shall be maintained in such condition that there will be no leakage or backing up of smoke and noxious gases into the dwelling.
- (5) All exterior surfaces subject to deterioration shall be properly maintained and protected from the elements by paint or other approved protective coating applied in a workmanlike fashion.
- (6) Every plumbing fixture, water pipe, waste pipe and drain shall be maintained in good sanitary working condition, free from defects, leaks and obstructions.
- (7) The floor surface of every water closet compartment, bathroom and shower room shall be maintained so as to be reasonably impervious to water and so as to permit such floor to be easily kept in a clean and sanitary condition.
- (8) Every supplied facility, piece of equipment, or utility required in this code shall be maintained in a safe and satisfactory working condition. No owner or occupant shall cause any service, facility, equipment, or utility required in this code to be removed from or discontinued for any occupied dwelling or dwelling unit except for such temporary interruption as may be necessary while actual repairs, replacement, or alterations are in process.
- (9) For these purposes, every owner of a building containing three (3), or more, dwelling units, shall provide the continuing services of a person or persons solely to assure that the minimum requirements of maintenance and sanitation, as provided by this article, are maintained on the premises at all times. The landlord shall provide the tenant with the name, address, and phone number of the person or persons providing the continuing services. Said notice shall be given to the tenant by either posting the notice in a conspicuous place at the building site or by

supplying the tenant with the information at the inception of the lease. The landlord is further charged with informing the tenant of any change of name, address, or phone number of the person or persons providing the continuing service.

**Minimum space, use and location requirements.**

- (1) Every dwelling unit shall contain a minimum gross floor area of at least one hundred fifty (150) square feet for the first occupant, one hundred (100) square feet for each of the next two (2) occupants, and at least seventy-five (75) square feet for each occupant thereafter. Floor space shall be calculated on the basis of total habitable room area.
- (2) In every dwelling unit of two (2) or more habitable rooms, every room occupied for sleeping purposes by one (1) occupant shall have a minimum gross floor area of at least eighty (80) square feet. Every room occupied for sleeping purposes by more than one (1) occupant shall have a minimum gross floor area of fifty (50) square feet per occupant. Every room used for sleeping purposes shall have a minimum width of eight (8) feet. Kitchens shall not be used for sleeping purposes. Porches shall not be used as permanent sleeping quarters.
- (3) At least one-half of the floor area of every habitable room shall have a ceiling height of at least seven (7) feet. Any portion of a room having a ceiling height of less than five (5) feet shall not be considered in computing the total floor area of such room.
- (4) No dwelling or dwelling unit containing two (2) or more sleeping rooms shall be so arranged that access to a bathroom, shower room, or water closet compartment intended for use by occupants of more than one (1) sleeping room can be had only by going through another sleeping room or outside the structure, nor shall room arrangements be such that access to a sleeping room can be had only by going through another sleeping room, bathroom, shower room, or water closet compartment.
- (5) No cellar or basement space shall be used as a habitable room or dwelling unit.

***D. LOW INCOME TARGETING***

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income:

**Note:** At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

**Response:**

The County will appropriate or otherwise make available \$19,900,000 (32%) of NSP funds to meet the low income housing requirement for those individuals and families at or below 50% of AMI, exceeding the statutory requirement of 25% of the County's NSP allocation. These funds will be used under acquisition and redevelopment of multi-family rental housing for individuals with incomes at or below 50% of AMI. It is anticipated that a total of 201 housing units will be available for the direct benefit of individuals or families at or below 50% of AMI.

***E. ACQUISITIONS & RELOCATION***

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e.,  $\leq 80\%$  of area median income).

If so, include:

- The number of low- and moderate-income dwelling units—i.e.,  $\leq 80\%$  of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e.,  $\leq 120\%$  of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

**Response:**

It is estimated that up to 80 dwelling units may be deemed blighted and demolished.

It is anticipated that of these units, none will be redeveloped for use as dwellings and made available for purchase. The parcels may be used for enhancing the County's neighborhood stabilization efforts and if possible, the County may convert the parcels into green spaces and where contiguous parcels allow, re-use as public facilities such as government service centers, parks and/or recreation centers. The County does not anticipate any relocation being required.

***F. PUBLIC COMMENT***

Provide a summary of public comments received to the proposed NSP Substantial Amendment.

Response:

The comment period was from October 29, 2008 to November 20, 2008 and included two community meetings. A synopsis of public comments from community meetings was prepared and appears below. A summary of the written public comments is provided and copies of those written comments are also provided in this section.

**Substantial Amendment to the 2008 Action Plan  
Citizen Participation  
Community Meeting  
October 30, 2008  
South Dade Government Center**

The Miami-Dade County's Office of Community and Economic Development held a community meeting to garner comments on the proposed Plan. At the October 30, 2008 meeting some of the comments included the following:

- ❖ Some structures should be demolished and new units should be built in their place.
- ❖ The money should be distributed based on the need in the community and it appears that the greatest need is in Districts 8 and 9.
- ❖ There should be an entry point of information, where you counsel people in Districts 8 and 9, making them aware of these programs.
- ❖ There is not enough money to buy all the REO's in the County.
- ❖ You should modify mortgages to keep people in homes.
- ❖ It appears that funds are being used to address a continuous problem that is HOPE VI.
- ❖ Include a Neighborhood Planning Piece.
- ❖ We need a bank that can do loan modifications.
- ❖ The 50% and below of area median income should not be excluded from homeownership, even if it takes \$100,000 of subsidy.
- ❖ There should be a plan to do something with demolished homes.
- ❖ Utilize these funds as part of the comprehensive (Moss) Plan.
- ❖ Education is missing from the Plan. There is not enough funding to do adequate homebuyer education.
- ❖ County should set up a CDFI.

**Substantial Amendment to the 2008 Action Plan  
Citizen Participation  
Community Meeting  
November 6, 2008  
Caleb Center**

The Miami-Dade County's Office of Community and Economic Development held a community meeting to garner comments on the proposed Plan. At the November 6, 2008 meeting some of the comments included the following:

- ❖ Did the County consider that the units it acquires will be removed from the tax base? This does not seem to be in line with stabilizing the neighborhood during a time when revenues are shrinking.
- ❖ Homeownership is a stabilizing force and should be emphasized.
- ❖ This can become like public housing (County acquiring Multi-Family).
- ❖ A developer may want to come to the County with some capital for the single family deal and have the County be more flexible regarding having a buyer ready.
- ❖ These funds should not be a bail out for HOPE VI.
- ❖ There are a lot of very low income families (50% and below AMI) that can qualify for Homeownership with \$80,000 in subsidy.
- ❖ Homeowner is portrayed as bad, when it's the bad people that made bad decisions.

**Neighborhood Stabilization Program  
Summary of Public Comments**

**Northern Trust Bank  
W. Robert Smith, III  
Vice President**

1. Instead of using the \$26.6 million to purchase and rehabilitate rental housing, use these funds to bail out condo converters or “under funded” tax-credit multifamily projects.
2. Due to the slow movement of governmental projects, the single-family home acquisition/rehab project may languish until the condition of the properties has deteriorated beyond repair.
3. County needs to make subsidy available for “spot loans” to help qualified buyers homeowners.
4. County purchasing properties will reduce tax rolls and negatively impact the tax base.
5. None of the monies may be used to prevent homeowners from losing their homes.
6. Recommends the County reverses priorities with more money going toward homeownership and less toward rentals.

**The Housing Authority of the City of Miami Beach  
Michael O’Hara  
Director of Housing Development Programs**

1. Requests that Miami-Dade County includes redevelopment of demolished or vacant properties as an eligible activity.
2. Requests that MDC include public housing authorities under this section of the plan to acquire, rehabilitate and manage multi-family rental housing.
3. Requests that MDC include public housing authorities when partnering with entitlement cities to acquire multifamily housing.
4. Requests that MDC also direct funding under the HOPE VI initiative to the development of affordable housing in Miami Beach on vacant land owned by the Housing Authority of the City of Miami Beach.

**Builders Association of South Florida (BASF)  
Realtors Association of Miami and the Beaches (RAMB)**

1. Requests that the funding for purchasing foreclosed multifamily rental properties be reduced and those funds are added toward purchasing, rehabilitation and selling of foreclosed single family homes to qualified families.
2. The Associations have prepared an Expedited Home Repair process to ensure the County funds are spent within the required time frame.
3. Associations support the allocation for the Hope VI project.



4. Administrative costs should be reduced to 5% instead of the proposed 10%.
5. Associations recommend a Rent-To-Own or Renting option in the event a unit does not have a qualified buyer within 90 days of completion.

**Barry Goldmeier**

1. Overhead allocation should be reduced to 5% instead of proposed 10%.
2. Allocation of funds for rental and ownership programs is backwards. More money should be allocated to homeownership (\$44 million towards homeownership and \$13 million on rental projects).
3. County should not purchase multifamily units.
4. Use of funds for HOPE VI is inappropriate.

**Ester Alfau-Compas, ABR**

1. Benefit to the community to fund more homeownership units than rental units.
2. County would end up paying more for real estate properties than private entities.
3. County's estimate of \$125,000 per rental unit is too high, should be around \$60,000 per unit.
4. By the County purchasing property directly, this will reduce the tax base and therefore reduce revenues.
5. The NSP funding should allow the participation of properties where foreclosure proceedings have started but not completed.
6. By using the figures of \$60,000 per rental unit and \$70,000 per homeownership unit, this will allow the County to produce 950 units which is almost twice the number of units in the proposal.

**Greater Miami Chamber of Commerce**  
**Carlos Fernandez-Guzman**  
**Chairman**

**Barry E. Johnson**  
**President/C.E.O.**

1. Funding distribution should be streamlined for maximum efficiency to achieve the required deadlines.
2. Mechanisms for HERA funds distribution should be formulated to maximize the leverage of these funds with other funding sources to accommodate the maximum number of households earning up to 120% AMI.
3. Mechanisms should be formulated with the intent to improve the access to and "preserve" housing stock (sale or rental) targeted for HERA funds.

4. Plans should not only address the current crisis but also be proactive going forward to address the long term needs for affordable and workforce housing throughout MDC.

**Miami Coalition for the Homeless, Inc.**

**Ben Burton**

1. Agrees with the plan's allocation for the acquisition and rehabilitation of multi-family properties for use as rental housing.
2. Recommends an increase under Low Income Targeting in the amount of funding available for families below 50% AMI. Also recommends that this portion of the plan list a specific funding amount for households below 30% AMI.
3. Specifically allocate a portion of the 448 rental housing units to households below 30% AMI.
4. Be more specific regarding the income groups that will be benefited by continuing affordability requirements. On pages 30 and 42, Miami Coalition recommends rewording "(c) rents must remain affordable as defined under Part C(2) of this Application" to "(c) rents must remain affordable to the income groups specified in the agreement with the County."
5. Have a requirement regarding the number of units that are to be set-aside for households whose income is 30% or below AMI.
6. Designate a significant portion of the 236 units in the HOPE VI project to households with income of 30% AMI or below.
7. Plan should contain an explanation of the statement, under Acquisitions and Relocation, that the County does not anticipate any relocation being required.

**The Affordable Housing Task Force**

**Shahrzad Emami**

**Project Attorney, Legal Services of Greater Miami**

**Chuck Elsesser**

**Project Attorney, Florida Legal Services**

**Tony Romano**

**Organizing Director, The Miami Workers Center**

1. 50% of the funds should be used to assist in the purchase and rehabilitation of multifamily rental buildings that are affordable to renters making less than 50% AMI.
2. Tenants should have the same rights as those living in public housing and the County should operate these properties using the Miami-Dade Housing Agency's Admission and Continued Occupancy Policy (ACOP).
3. The purchase and rehabilitation of these units should be in the area of greatest need.

4. Funds should be made available to outside developers. Highest consideration given to tenant groups and their chosen nonprofit partners who wish to purchase and rehabilitate properties.
5. NSP funds should be used to incorporate modern, green building and energy efficiency improvements in all activities.
6. Portion of the funds should be set aside for mobile home park preservation.

**Lewis Swezy Realty**  
**Paul Bilton**

1. Funds need to be allocated to gap funding for new construction of affordable housing rentals.

**Phillip Murray Jr.**

1. If you tear something down, then build something there. Empty lots must be maintained.

**DLW Enterprise**  
**David Wilson**

1. County should put forth a joint financing model where there is less risk for the County and more incentive for the Developer to move forward. Where either the acquisition/rehab is reimbursed prior to the contract phase.

**Citrus Health Network, Inc.**  
**Olga Golik, Esq.**  
**Director of Housing and Advocacy**

1. Request that the County explore the options of providing single family homes to non-profits who can rent the homes to persons with urgent housing needs.
2. Request the County identify multifamily rental buildings that can provide affordable housing to extremely low income households.
3. Recommend that the minimum standards for these properties include design features to increase accessibility of the units.

**Sheppard Faber**

1. Consider properties that were acquired by lenders by way of acceptance of a deed in lieu of foreclosure.

**Carlisle Development Group**  
**Matthew Greer**  
**Chief Executive Officer**

1. Utilize funds to provide second mortgages (that can be forgiven over time) to eligible homebuyers that open their homes to 1 to 2 special needs population (youths aging out of Foster Care, Elderly, Disabled, Homeless)
2. Use a portion of the 10% administrative fee for counseling and social service agencies.
3. Allow one grantee with sufficient resources, experience and readiness to proceed to administer the majority of NSP funds.
4. For 2009 mini-RFA cycle, utilize NSP funds to supplement sources for gap financing applicants with 2008 housing credit awarded developments.
5. Present a broad based plan to include all of the Eligible Activities in order to maximize and allocate funds in the required timeframe.
6. Make funds available to non-profit and for-profit developers.
7. Encourage the utilization of funds for a variety of income levels.

**Tom Fogarty**

1. Request that consideration be given to individual lenders who reside in Miami-Dade County and not only Banks.
2. Include duplexes for consideration when targeting single family homes.

**Florida Mold Inspections, Inc.**  
**Peter Romano**  
**President**

1. Recommends a mold inspection be performed on properties purchased to protect the clients under the NSP program.

**Princetonian Mobile Home Park**  
**Ms. Mades**

1. Purchase existing mobile home park with NSP funds.

**United States Veterans Initiative**  
**Stephanie C. Buckley**  
**Regional Director**

1. Current plan does not target the growing needs of veterans, including homeless veterans and other low income veterans in Miami-Dade County.
2. Amend the NSP Substantial Amendment to commit \$5,000,000 of the funds allocated under the activity NSP Acquisition and Rehabilitation of Multi-family Affordable Rental Housing to U.S. VETS for rental to low income veterans, both single adults and veterans with families.

Northern Trust Bank  
700 Brickell Avenue  
Miami, Florida 33131  
305-372-1000



**Northern Trust**

**Via Courier**

November 6, 2008

Ms. Hana Eskra, Acting Director  
Miami-Dade County Office of Community and Economic Development  
701 NW 1 Court, 14<sup>th</sup> Floor  
Miami, Florida 33136

Re: Public Comment on Miami-Dade County Proposed Substantial Amendment to the 2008 Action Plan with Funding from Title III of the Housing and Economic Recovery Act of 2008 for the Neighborhood Stabilization Program

Dear Ms. Eskra:

I wish to comment regarding the above referenced proposed plan. I am a resident of Miami-Dade County and a Vice President of Northern Trust, NA. I and this institution have been actively engaged in providing mortgage loans to persons of low to moderate income in tandem with the County's Surtax, SHIP, and HOME programs since 1985.

I am concerned with certain factors of the proposed plan for a number of reasons:

1. That the bulk of the money, \$26.6 million is proposed to be used to purchase and rehabilitate rental housing. There is a need for affordable rental units in the area, however, Miami-Dade County has a proven less than stellar track record of public housing management. Likewise, privatization has met with limited success. I fear that these funds could be used to bail out condo converters who were attempting to sell their converted rental units as condos far in excess of the unit's intrinsic value, or into "under funded" tax-credit multifamily projects, thereby not benefiting the people or neighborhoods who most require the assistance.
2. The speed at which projects of this magnitude move forward in government can be glacial at best. Clearing title problems can take years (ask any developer who has acquired infill properties from the county.) I fear that the single-family home acquisition/rehab project may languish until the \$1 million slated for demolition needs to be tapped to tear down homes whose blighted condition has deteriorated beyond repair unnecessarily.



Northern Trust

Ms. Hana Eskra

Page 2

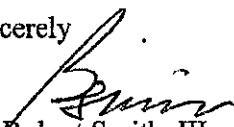
3. Every bank engaged in non-subprime affordable housing lending in our county has numerous creditworthy working poor who given the right combination of bank and subsidy financing are prime candidates for homeownership. These borrowers could take rapid advantage of the decline in values, but because the county has not made subsidy available for "spot loans" as in the past, are unable to do so. In addition, counties across the nation have proven that government management of rental housing does not stabilize a neighborhood, hence the HOPE VI program whose mission is to tear down public housing units and replace them with a mixture of homeownership and rental units.
4. Every property acquired and held by the county will immediately drop off of the tax rolls the moment the deed is recorded, thereby negatively impacting the tax base.
5. Regrettably, none of the monies may be used to prevent homeowners from losing their homes. I understand that this may be mandated by Washington and not the County, but it is not a holistic approach as families will continue to lose their homes only to be replaced by others in a sort of "vicious circle".

I recommend that the County reverse priorities, with \$26.6 million or more going to fund affordable homeownership opportunities and far less to acquisition of rental projects. By doing so, the Realtor industry could also play a role, banks would have incentive to extend credit, bolstered by the lessening of risk created by a housing subsidy leverage, more properties will continue to generate tax revenue and a path toward the creation of wealth via homeownership will be created where it is needed most.

I also recommend that where possible, these monies substitute for county dollars that may by law be used to assist families of low to moderate income avoid foreclosure on their homes (i.e.: switch and use Surtax funds for this purpose, and fund Surtax initiatives with these dollars.)

I ask that County Staff and Elected Officials take these issues into consideration prior to any implementation of the plan as submitted.

Sincerely

  
W. Robert Smith, III  
Vice President

cc: Hon. Mayor and Members, Board of County Commissioners



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THE HOUSING AUTHORITY  
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CITY OF MIAMI BEACH

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ADA LLERANDI  
COMMISSIONER

LEONARD TURKEL  
COMMISSIONER

MIGUELL DEL CAMPILLO  
EXECUTIVE DIRECTOR

November 10, 2008

Hana Eskra, Acting Director  
Office of Community and Economic Development  
Miami-Dade County  
701 NW 1<sup>st</sup> Court, 14<sup>th</sup> Floor  
Miami, FL 33136

Re: Comments on Substantial Amendment to Action Plan for Neighborhood Stabilization Program

Dear Ms. Eskra:

The Housing Authority of the City of Miami Beach (HACMB) hereby submits the following comments on Miami-Dade County's Substantial Amendment to the 2008 Action Plan with funding from Title III of the Housing and Economic Recovery Act of 2008 for the Neighborhood Stabilization Program:

**Page 26** – "...Miami-Dade County's proposed NSP contains six eligible activities..."

*The HACMB requests that Miami-Dade County include the redevelopment of demolished or vacant properties as an eligible activity. The redevelopment of demolished or vacant properties is an eligible use under the NSP. The HACMB is the owner of several vacant land parcels located in Miami Beach that are suitable for development of affordable housing under this funding initiative.*

**Page 30** – "...The County may also select for-profit and not-for-profit housing developers to acquire, rehabilitate and manage multi-family rental housing..."

*The HACMB requests that Miami-Dade County include public housing authorities under this section. The HACMB is a public housing authority created by Section 421.04, Florida Statutes, and therefore does not meet the definition of a not-for-profit developer.*



**Page 42** – "...The County may also select for-profit and not-for-profit housing developers to acquire, rehabilitate and manage multi-family rental housing..."

*The HACMB requests that Miami-Dade County include public housing authorities under this section. The HACMB is a public housing authority created by Section 421.04, Florida Statutes, and therefore does not meet the definition of a not-for-profit developer.*

**Page 42** – "...The County may partner with entitlement cities to acquire multi-family housing..."

*The HACMB requests that Miami-Dade County include public housing authorities, such as the HACMB, under this section.*

**Page 46** – "...NSP funds under this activity will be directed toward the Scott Carver HOPE VI affordable housing project..."

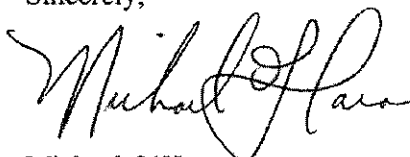
*The HACMB requests that Miami-Dade County also direct funding under this initiative to the development of affordable housing in Miami Beach on vacant land parcels owned by the HACMB. Several of these parcels are in the final stages of permitting and would allow for completion and occupancy before the NSP project end date.*

**Other** - Attached please find a document prepared by FAHRO entitled: *Suggested Items to be included in HERA Action Plans*. FAHRO believes that housing authorities can be a very productive and useful partner for use and distribution of the NSP funds, particularly the 25% targeted to families at 50% AMI or below.

Should you have any questions or need any further information, please feel free to contact me at (305) 532-6401, extension 3033 or via email at: [mike@mbha.org](mailto:mike@mbha.org)

Thank you in advance for your time and cooperation.

Sincerely,



Michael O'Hara  
Director of Housing Development Programs

cc: Bruno A. Barreiro, Chairman, Board of County Commissioners, District 5  
Corey Mathews, Executive Director, FAHRO  
Miguel Del Campillo, Executive Director, HACMB



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*The non-profit association representing the officials providing affordable housing in Florida.*

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## **Suggested Items to be included in HERA Action Plans**

**Background:** HERA provides \$3.92 billion of CDBG program funds for communities hardest hit by the foreclosure crisis nationwide. Florida has been allocated \$541 million. The funds will be distributed to Entitlement Cities and the State of Florida for non-entitlement cities. HERA requires at least 25% of the funds be used for individuals and families whose income does not exceed 50% of median income.

**FAHRO believes that Housing Authorities can be very productive and useful partner for use and distribution of these funds, particularly the 25% targeted to families at 50% AMI or below for the following reasons:**

1. We deal with families at 50% and below AMI everyday
2. We have long waiting lists for individuals and families that need services that can be targeted.
3. We administer homeownership programs through both the housing choice voucher and public housing programs with a long list of potential clients.
4. Many Housing Authorities have run major rehab projects and are knowledgeable in the upgrades needed to properties and, as a result, are familiar with Davis Bacon and environmental review requirements.
5. Housing Authorities are familiar with local building codes; HUD modernization standards; HUD Uniform Physical Condition Standards, and HUD Housing Quality Standards for all of their properties owned, operated and/or assisted.

We believe Housing Authorities can be useful partners to assist in meeting local and statewide goals as follows:

1. Multifamily projects could be deeded to the local Housing Authority for potential use as new affordable/public housing for families at 50% of AMI with the understanding that deed restrictions would apply.
2. Scattered single family units could be deeded to the local HA for use as scattered site affordable/public housing rentals where mortgages/gap financing may not be available for families at 50% AMI with the understanding that deed restrictions would apply.
3. Scattered single family units could be deeded to the local HA as rent to own units for the local HA's homeownership program using the housing choice voucher as mortgage leverage.
4. Housing Authorities can be an asset in mortgage financing with the use of the Project Based Assistance.
5. Funding may be available for use in new construction of rental units on vacant land.

**Proposal for funding allocation for  
Housing and Economic Recovery Act (HERA) funds  
By  
Builders Association of South Florida (BASF)  
Realtors Association of Miami and the Beaches (RAMB)**

**I. The BASF and RAMB support the County staff's proposed allocation categories in the draft HERA Plan.**

**II. However, the Associations respectfully recommend a different funds allocation to more fairly and accurately meet the intent of the Federal law.**

The title of the Federal Law is: **"Emergency Assistance for the Redevelopment of Abandoned and Foreclosed Homes"** (Source: Title III of HERA Act). The clearly stated criteria of the Federal law are to help home owners whose:

- (A) Homes are being foreclosed or are foreclosed now;
- (B) Homes are financed by a subprime mortgage; or
- (C) Homes are in default or who are delinquent in their payments.

(Source: Title III, Section 2301, (b) (3), (A-C))

**Instead, however, the County-proposed plan allocates most of these funds toward buying foreclosed or abandoned Section 8 apartment buildings.**

**HERA Federal funding is a one-time Emergency funding source. There are other on-going Federal programs for restoring Section 8 buildings, which should be used for this purpose.** While this may be an allowable purchase, the Associations think the funds for this purpose should be reduced. Their reasons are set forth below.

Although the county's study mapped out foreclosures, it did not appear to distinguish between single family homes and multi-family building foreclosures. **Thus, we do not understand the basis for allocating the bulk of funds for buying some foreclosed apartment buildings.**

**Florida has the second highest home foreclosure rate in the country, according to RealtyTrac Inc's September 2008 report. Neighborhood stability increases when families can continue to live in their homes. That is part of the spirit and intent of the Federal legislation. Repairing and re-selling foreclosed homes throughout the County will provide more support for these families and more stability in many more neighborhoods than buying several abandoned apartment buildings.**

**To make this happen smarter and sooner, the Associations have prepared an Expedited Home Repair process to ensure County funds are spent on repairing homes within the required 18-month-time frame and re-sell the homes to qualified families, with HERA funds being used to provide soft-second mortgages. (See attached details).**

III. Second, the HERA law already provides a specific set-aside of at least 25% of the funds for providing rental assistance to families making less than 50% of Average Median Income. This will help provide housing assistance to those who have lost their homes due to the housing crisis.

So: while BASF and RAMB agree that a certain amount of funds should be allocated to assist in the purchase and repair of some Section 8 buildings, the bulk of the funds should be put toward repairing foreclosed homes for re-sale to qualified families.

IV. As part of the County's overall effort to promote greater housing affordability, BASF and RAMB support the County's proposed \$8.6 million allocation for the HOPE VI project. This project must be completed to meet the commitment the County has made to this community, when the Scott-Carver homes were demolished.

V. **Administrative Costs** – Members are unclear as to why 10% - or \$6.2 million of the Federal funds - are needed to pay for program costs, when:

- The County has existing staff who can perform these functions, and
- Most are existing programs which are simply getting a one-time infusion of funds.
- Smarter use of these funds would be to put the funds toward helping more families out of financing trouble.
- Based on the above, a fair amount would be to keep the administrative and overhead costs to \$3.1 million.

VI. **In conclusion, the Associations support the following:**

(A) **The proposed County plan's categories and supporting information.**

(B) **A different funding allocation (see attached);**

- **Proposal could include a new target of rental funds to build apartments for families from 61%-120% of AMI, this will serve families closer to the "workforce" definition population. Those at or below 60% of AMI are already being targeted for use of funds.**

(C) **An Expedited Home Repair Process to repair and sell all repaired units to qualified families.**

(See attached for all details). **The Expedited Home Repair Process would require that:**

- **Qualified builders would bear the entire risk of repairing and selling the homes to qualified buyers at agreed-upon price points; and**
- **The County would provide soft-second mortgages for qualified families similar to the county's current Surtax program, to keep HERA funds circulating, thus helping the most families.**

**Rent-To-Own or Renting Option:**

(D) **If qualified buyers could not be found within 90 days of the unit's completion, qualified families could enter into a rent-to-own program or simply rent the home.**

**Benefits of the Associations' Recommendations:**

- The County's long-sought after goal of affordable home ownership for more families is now closer than ever, if HERA funds are used in this manner.
- Expedited Spending Plan would generate fast repair and sale of foreclosed homes.
- Stabilize home prices, neighborhoods and local economy sooner – the root cause of our financial crisis.
- Employ more people in these construction jobs sooner.

11/08/08 2:41 PM

Dear Hana & Zefar:

I am writing to comment on OCEDs plans to utilize the \$62,000,000 in special CDBG funding that is being allocated to Miami-Dade County by Title III of HR 3221 the Housing and Economic Recovery Act (HERA).

My comments are as follows:

1- The **overhead allocation** of 10% is more than double what is actually needed because no new personnel have to be hired since OCED is already administering similar programs utilizing SHIP, SurTax and HOME funds. A more realistic overhead cost would be 5% which still generates \$3,100,000 for your department.

2- **Division between rental and ownership programs** is exactly backwards. The 25% directed toward families with incomes of 50% of AMI should be more than enough to take care of the 50% families who even during the boom could not qualify for mortgages and certainly will not qualify now. The rental money should be directed to these families. The remaining 75% of the funds should be directed according to the County's 5 year plan which promotes ownership for low income families over rentals.

3- The **County should not seek to buy multifamily units** because of the numerous pitfalls involved in buying into a failed condominium development. Some of these are:

- a) If the condo building is **occupied** the stringent and costly CDBG relocation requirements kick in.
- b) If the condo building is **"fractured"** because units have been transferred to individual owners, there is no way of predicting or controlling the increase in maintenance costs and the imposition in special assessments that could double the maintenance costs making the building not affordable.
- c) If the building is **vacant** and has not transferred title to units yet, the owners probably have not paid all the contractors or sub-contractors and there are probably liens and pending litigation on the project.
- d) If the building is **not yet foreclosed** or bank owned it is not appropriate use of funds since it will not have been bank owned or abandoned.
- e) There are comparatively **very few suitable multifamily buildings** that meet the criteria of the HERA making the effort difficult and may risk not being able to have been accomplished in time.
- f) The **families who have lost their homes** to foreclosure are different from the families who would live in Section 8 or Tax credit projects that are restricted to 50% and 60% of AMI. Those families would prefer to rent individual units in ownership area as apposed to in low income rental communities.

4- The use of these funds for a **HOPE IV project is inappropriate** and not in keeping with the intent of the funding. The Scott Homes has been torn down so it is not abandoned and is not bank owned. There are special funding sources for HOPE IV and this HERA money is a one shot at dealing with a festering and timely problems effecting multiples of the families waiting for housing from Scott Homes.

5- **Scattered ownership units** can be bought, rehabbed and sold **must quicker** than doing the same thing with a rental project. There are many times more scattered units available for sale from banks than rental projects. The cost of buying scattered ownership units will be much less and the cost of renovation will be substantially less because the ownership units that had been foreclosed are mostly brand new. Entire rental projects that had been foreclosed on are very rare and much older requiring much more rehab work. Ownership units in scattered projects is overall faster and more cost effective.

6- **If you follow the way the funds were allocated it is clear that the funding is intended to be utilized on buying vacant ownership units owned by banks** and selling them to low income buyers. The rental option is only if it can't be readily sold. The third option is to demolish the units. Clearly the funds are intended to be used to buy up the vacant foreclosed units that are negatively effecting various neighborhoods in the County. Miami-Dade got the largest allocation because it have the most vacant foreclosed units, not section 8 or other apartment projects. The property market in the County has been destroyed by the glut of vacant foreclosed individual scattered houses, townhouses and condos. The money should be used to deal with that problem.

I urge you to use the funding properly and allocate \$44,000,000 (75%) in total to the purchase, rehab and sale of scattered ownership units and no more than a total of \$13,000,000 (25%) on rental projects.

Barry Goldmeier  
cell: (305)984-3595

RE: Public Comment on MD County Proposed Substantial Amendment to the 2008 Action Plan with Funding from Title III of the Housing & Economic Recovery Act of 2008 for the Neighborhood Stabilization Program

Dear Mr. Brown,

This email contains my comments regarding the above referenced proposed plan. I am a resident of Miami-Dade County, as well as the President of Adamo Community Solutions, Inc., an affordable/workforce housing consulting firm in operation for the past 10 years.

Since 1988, I have been directly involved in the delivery of close to 7,000 housing units (new construction, rehabilitation, rental & homeownership units) for very low, low & moderate income individuals in the State of Florida. Most of these units were structured financing layering and closing multiple funding sources such as LIHTC, tax-exempt bond, AHP, SHIP, HOME, CDBG, HOME, HOPE 3, and Surtax.

My knowledge and experience in affordable housing is wide and includes all perspectives - governmental, nonprofit and for profit. These comments are coming from the perspective of an affordable housing advocate who have worked and delivered affordable housing units effectively in a similar economic situation, where the housing market collapsed in mid-1980's.

Below is a summary of the program per county drafted plan. The following activities are to be funded as follows:

Name of Activities	Dollar Amount	% of Total Grant
Homeownership Activities	\$19,815,000	31.85%
Rental Activities	\$35,171,480	56.54%
Demolition	\$ 1,000,000	1.61%
NSP Administration	\$ 6,220,720	10.00%
Total	\$62,207,200	100.00%

**Other Relevant Information Included in Drafted Plan for Use of these Funds**

1. A minimum of \$15,551,800 of NSP funds will be targeted to those earning up to 50% of AMI.
2. Multi-family rental housing properties would be purchased by the County and added to the County's existing affordable rental housing inventory.
3. Rental units in multi-family rental buildings purchased by the County be occupied by individuals and households at 120% of AMI or less;
4. The County would use funds to purchase and rehabilitate foreclosed-upon homes. The county reserves the right to rent these units.
5. The county will conduct property appraisals.
6. Redevelop demolished or vacant properties in the area of Scott Carver HOPE VI affordable housing project, producing 236 rental units for 60% of AMI or below.
7. Assumptions (Performance Measures pages 48-49):
  - a. Second mortgage average amount of \$75,000. Total allocation of \$9,750,000
  - b. Funding of acquisition & rehabilitation of single family homes (either purchased directly by the County or thru a pool of approved builders) -

- Average acquisition & rehabilitation amount - \$200,000/unit. Total allocation of \$10,000,000
- c. Funding of acquisition & rehabilitation of multi-family properties for use as affordable rental housing - \$125,000/unit. Total allocation of \$26,571,480.
  - d. Neighborhood Redevelopment - HOPE VI - \$112,360/unit. Total allocation of \$8,600,000. This funding is restricted to households that are 51% to 60% of AMI.

**Other Pertinent Information regarding other County Housing Programs**

1. County Lottery Program for Home Ownership. It was open for only 45 days. During the period, the county received 137 completed applications from mortgage ready 1<sup>st</sup> time home buyers.
2. The AMI for these borrowers were:
  - a. Eleven percent (11%) at 50% of AMI or below;
  - b. Forty-five percent (45%) at 80% of AMI or below;
  - c. Thirty-Six percent (36%) at 120% of AMI or below;
  - d. Eight percent (8%) above 120% of AMI
3. Many tax credit rental communities recently built are located in the areas designated highest priority, high priority, moderate priority of the substantial amendment to the consolidated plan.
4. Monthly rents in tax credit affordable rental communities are affordable to residents earning up to 60% of AMI.
5. Most tax credit rental communities placed in the past 12-24 months, are experiencing a minimum vacancy rate between 10-15%. There's a surplus of affordable rental units in the most affected areas (priority areas)

Based on all this information, which can be easily verified by anybody, below are my comments:

1. In the affordable market, Miami-Dade residents earning between 40% - 120% of AMI, there seems to be a higher demand for home ownership units than more rental units. Therefore it is for the benefit of the community to fund more home ownership units than rental units.
2. Per county staff own calculations, the average soft-second loan (\$75,000) is much less than any other of the activities. However, it is reasonable to assume that the total purchase price, including rehab would be average \$200,000. By providing soft seconds, ***the county would be leveraging public funding more effectively, almost \$3 private to \$1 public.***
3. Historically, the county (government in general) end up paying more for real estate properties than private entities. Government has a lesser ability to negotiate prices.
4. In today's market, the average foreclosed or short sale vacant rental properties (more than 4 units) is around \$60,000/unit. So, why would the county want to pay up to \$125,000/unit? By doing this, the county is over-subsidizing. There's no private dollars going into these units, only federal NSP funding. That is simply a waste of public resources.



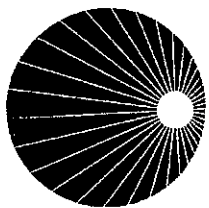
5. The county's track record as rental property owner has not been the best, with the exception of a few affordable housing rental complexes, which are located in areas completely different from those areas identified in the substantial amendment of the consolidated plan. Therefore those well managed county owned properties serve a totally different market.
6. By buying properties directly (either single or multifamily), the county would be taking properties off its tax base. This is not the time to be 'losing revenue' by reducing the tax base. On the contrary, elected officials need to look for innovative ways to increase the county's revenue stream.
7. The surplus of tax credit rental units seems to be sufficient to provide housing from the displaced families and ex-home owners who went thru the pain of foreclosure.
8. Many investors, since they cannot sell their units at their anticipated sales price, are renting them. So, in addition to the tax credit units, there are a number of open market rental properties affordable to those earning more than 60% of AMI.
9. It has been demonstrated that the vast majority of the home owners who bought homes with some type of subsidized financing from the county in the past 15 years, they either still own their home OR they sold during the boom and moved on. Foreclosure rate is very low. County staff can easily demonstrate the validity of this statement.
10. National studies have demonstrated that home ownership provides a broad range of benefits to individual homeowners and to society as a whole. Some of them include:
  - a. The children of homeowners do better in school and are more successful later in life.
  - b. Homeownership acts as a powerful economic stimulus, benefiting the individual homeowner and the national economy;
  - c. Homeownership benefits neighborhoods, providing economic & social capital. Homeowners are more likely to participate in local organizations.
  - d. Homeowners state they are more satisfied with their living conditions than renters.
11. The logical conclusion would be that our elected officials encourage home ownership more than rental. This would be a reversal of what is currently proposed. County residents would take advantage of the lowest prices. This would help stimulate an already sluggish economy.
12. All county's home ownership funding should go as a soft second in an acquisition/rehab program (it could be similar to FHA 203k), where private lenders leverage the public funds and a qualified first time buyer can purchase a property requiring work.
13. There's a federal requirement of using a minimum of 25% of total allocation towards residents earning up to 50% of AMI, it's popular knowledge that residents at 50% of AMI or below have greater challenges in buying. Therefore, the county should apply that minimum to rental housing. Instead, the county is recommending to use \$8,600,000 to fund 236 units restricted to households that are at 51% to 60% of AMI in the HOPE VI project.

14. **Federal Comment.** This NSP funding should allow the participation of properties where foreclosure proceedings have started, but haven't been completed. By doing this, we would 'rescue' properties before they require major rehabilitation work because they have been vacant for over one year; the current troubled home owner may have a chance to not completely ruin his/her credit history; and the lender would save thousands of dollars by not having to maintain or keep this property in their books for over a year.
15. By encouraging home ownership under this program, the County would be promoting the use of the Federal Homeownership tax credit, which puts \$7,500 into the pockets of first time home owners. That's money to spend in the local economy.
16. In this slow and down market, a maximum of \$60,000/unit for rental projects and a maximum of \$70,000/unit for home ownership seems to be adequate. Using an average of \$65,000/unit, the county can produce about 950 units. That is almost twice as much as currently proposed. It's that simple.

I urge county staff and elected official to take a deeper look at this drafted plan. The way it is currently written is not only obscure, making it difficult to understand the real objective of the funds, but it also seems to be directed to use these funds to continue funding money pits projects such as HOPE VI or new ones, where the county over subsidizes the units. I beg you not to over complicate matters. Keep it simple. There's a reason why US HUD provided general & simple guidelines. Pass on to the end users (county residents) that simplicity.

Very truly yours,

Ester Alfau-Compas, ABR



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COUNTY MANAGER'S OFFICE

October 31, 2008

Mr. George Burgess  
County Manager, Miami-Dade County  
111 N.W. First Street, Suite 2910  
Miami, FL 33128

Dear County Manager Burgess:

As you may know, for the past 3 years the Greater Miami Chamber's Workforce Housing Committee has been actively engaging stakeholders across Miami-Dade County and the South Florida region on the need for attainable housing for workers in South Florida. We have been doing this through convening's of key stakeholders such as the Municipal Leadership Roundtable Forum in May, the Spotlight on HERA in September, and the upcoming Regional Business Alliance event in November. We have heard clearly from these stakeholders that reliable information is critical and when captured across cities, county and even the broader South Florida Region, contextual information is essential. For this reason we have spearheaded the compilation of an information clearinghouse through our On-line Resource Center on our Chamber website at [www.miamichamber.com](http://www.miamichamber.com). Additionally, we also commissioned leading indicator research through the FIU Metropolitan Center, entitled the Housing Needs Assessment, which provided a thorough analysis of supply and demand factors as well as projections for our future housing needs.

Based on this platform of learning and collaboration we have acquired unique insights that we wish to share with you as you confer on the possible uses for the HERA funding your city/Miami Dade County will be receiving. The enclosed Chamber resolution offers some key principles we urge you to use throughout your deliberations.

Our Workforce Housing Committee chairs and staff will be in contact with you shortly to schedule appointments to further discuss in detail how you may "operationalize" these principles going forward.

We believe that in the midst of the worst foreclosure and credit crisis confronting our region, the issue of workforce housing takes on new urgency and new dimensions that require us to focus on as a community. By proactively connecting today's realities to the gaps caused by the market frenzy over the past 7 years we believe there are opportunities to be seized to meet the needs of our workers today and tomorrow. By doing so we will be addressing the continuing challenges facing our members in recruitment and retention of talent, one of the greatest impediments to our Community's economic health and vitality.

Thank you for your consideration.

Sincerely,

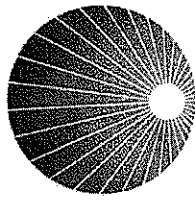
Mary Lou Tighe  
ML Tighe & Associates  
Local Advocacy Committee Chair  
Greater Miami Chamber of Commerce

Cheryl Jacobs  
Community Relations Director, Zyscovich Architects  
Workforce Housing Committee Chair  
Greater Miami Chamber of Commerce

**GREATER MIAMI CHAMBER OF COMMERCE**

1601 Biscayne Boulevard • Miami, Florida 33132-1260 • 305-350-7700 • Fax 305-374-6902  
Statewide Toll Free 888-660-5955

[www.miamichamber.com](http://www.miamichamber.com)  
*Miami-Dade County NSP Substantial Amendment*



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## **Workforce Housing Committee**

**Gloria Romero Roses**  
Project Management Consulting  
Vice Chair

**Cheryl Jacobs**  
Zyscovich Architects  
Chair

**Marc Williams**  
Home Financing Center  
Vice Chair

The premise of our review of the MIAMI-DADE COUNTY PROPOSED SUBSTANTIAL AMENDMENT TO THE 2008 ACTION PLAN WITH FUNDING FROM TITLE III OF THE HOUSING AND ECONOMIC RECOVERY ACT OF 2008 FOR THE NEIGHBORHOOD STABILIZATION PROGRAM was to identify anything that would contradict with the guiding principles of the Greater Miami Chamber of Commerce Resolution herewith attached:

1. Distribution will be streamlined for maximum efficiency to achieve the deadlines of commitment within 18 months and expenditures within 4 years,
2. Mechanisms will be formulated with the intent to maximize the leverage HERA's funding with other pools of funding to accommodate the most number of households earning up to the 120% AMI based on US HUD Income thresholds,
3. Mechanisms will be formulated with the intent to "preserve" the access to the housing stock (whether for sale or rental) targeted for HERA funds in perpetuity for those earning up to the 120% AMI based on US HUD Income thresholds,
4. In keeping with sound governmental practices, plans will track to needs driven today by crisis as well as proactively going forward so as to address the mid-long term needs for affordable and workforce housing across Miami-Dade County.

During the course of this review we identified questions that speak to how the County intends to apply these principles and as such have listed as such knowing that they may not be elements of this document but will emerge from steps forthcoming in the execution and implementation phase of this process.

We seek to provide this feedback on behalf of the Chamber in accordance with the Public Comments procedures outlined by County Staff:

1) We believe that the identification and distribution to the areas of greatest need was conducted in a methodical, transparent and consistent manner.

- We would anticipate that this fine work will not be diluted during the BCC approval phase of this process
- We would anticipate there would be more specific measures for tracking actual outcomes of funding vs those anticipated in the planning and ultimately how that fits into the broader needs of the community for stable housing for a broad range of income earners.

- We would anticipate clarity about who (agency/Staff members) will oversee and be accountable for the various phases of this process.

2) We understand that for this phase of the process the definition of “uses of funds” is very broad and ambiguous. So to this end in the subsequent phases:

- We would anticipate clarity about capacity of existing resources to execute in-house vs. out-sourcing.
- We would anticipate a specific reference to leveraging other sources of funding.
- We would anticipate specific reference of intent for long term preservation through specific mechanisms.
- We would anticipate specific reference of timelines for execution.

3) We understand that for this phase of the process the Definitions and Descriptions are fluid. So to this end in the subsequent phases we would anticipate:

- Blighted Structures – While clearly defining what is considered to be a blighted area or structure, an overlay of specifically blighted areas would be helpful for the community to understand where they can expect this work to be taking place.
- Affordability/Affordable Rents – Reference is made about having the same controls and oversight that is governing the current affordable housing programs, however our connection to practitioners in this field indicate that there are no real procedures in place to address how violations will be handled and who will oversee the possible property improvements and maintenance. The percentages meet the requirement of workforce housing at the 120% of AMI, however the accurate number of rental units set-aside for 50% or below has not been identified.
- Low Income Targeting- Reference is made to allocating at least 25% of the funds to assist individuals and families with incomes less than 50% of AMI. Based on our 2008 Needs Assessment, this will not be enough to address the growing need for that sector of the population. Strategies will need to be formulated to address the cost/benefits of down payment and closing cost programs for this segment of the market.
- Acquisitions & Relocation – Clear indication how the county will address assisting the 80% or below and still identify specifically 80 units that are deemed blighted and demolished and how it will handle relocation (if applicable, which based on past experience has been a huge concern for the community).

Should you have any questions please do not hesitate to contact Marina Foglia at [mfoglia@MiamiChamber.com](mailto:mfoglia@MiamiChamber.com) or at 305-577-5464.

**Greater Miami Chamber of Commerce**  
**1601 Biscayne Boulevard, Miami, Florida 33132 | Tel. 305.350.7700 | Fax 305.374.6902**  
**[www.MiamiChamber.com](http://www.MiamiChamber.com)**

*Miami-Dade County NSP Substantial Amendment*



## NEIGHBORHOOD STABILIZATION PROGRAM RESOLUTION

**WHEREAS**, the Greater Miami Chamber of Commerce comprised of over 2,500 business, with more than 5,700 members, is a regionally focused, activist chamber of commerce that promotes sustainable improved economic vitality and quality of life for South Florida; and

**WHEREAS**, the ability to recruit and retain an essential and talented workforce depends on the availability of adequate housing. The symbiotic relationship between workers and businesses necessitates that a broad range of income earners be offered adequate housing to sustain both themselves and their families; and

**WHEREAS**, the Workforce Housing Committee of the Chamber has been actively working to identify sustainable solutions to workforce housing needs since 2006. The committee has conducted studies and surveys that recognize that there is a significant need for adequate housing for members of the workforce that have income between 80-120% AMI (area median income) who are a major component of our overall workforce community; and

**WHEREAS**, the Housing and Economic Recovery Act of 2008 (HERA), HR 3221 will allocate approximately \$91 million to the State of Florida, \$62 million to Miami-Dade County and approximately \$29.7 million across five entitlement cities (City of Miami, Hialeah, North Miami, Homestead and Miami Gardens); and

**WHEREAS**, HERA provides a package of legislative initiatives that would help to stabilize the market and provide relief to hundreds of thousands of Americans who are struggling to keep their homes; and

**WHEREAS**, the following are uses for the HERA funds as authorized under Title III of Division B of the Housing and Economic Recovery Act of 2008 (HERA), for the purpose of assisting in the redevelopment of abandoned and foreclosed homes under the Emergency Assistance for Redevelopment of Abandoned and Foreclosed Homes heading, referred to as the Neighborhood Stabilization Program (NSP):

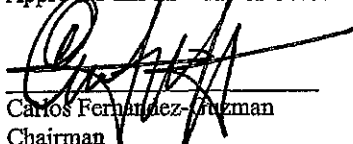
1. Buying abandoned or foreclosed homes.
2. Redeveloping demolished or vacant properties.
3. Demolishing or rehabilitating abandoned, foreclosed or blighted properties.
4. Offering down payment and closing cost assistance to low-to moderate-income homebuyers.
5. Reusing properties for affordable rental housing.
6. Creating land banks to assemble, temporarily manage, and dispose of vacant land for the purpose of stabilizing neighborhoods and encouraging reuse or redevelopment of property; and

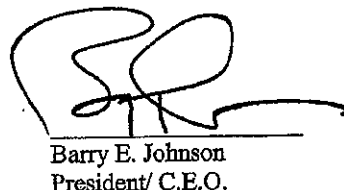
**WHEREAS**, these authorized uses may be expanded as a result of input from local governments pursuant to the accompanying guidelines detailed in the Federal Register, Vol. 73, No. 194, October 6, leaving discretion to policy makers and staff to formulate action plans that are responsive to local conditions; and

**NOW THEREFORE, BE IT RESOLVED** that the Greater Miami Chamber of Commerce requests state and local leaders include in their formulation of policies and plans for distribution of HERA funding they apply the following guiding principles:

1. Due to the time sensitive nature of the funding, state and local government distribution should be streamlined for maximum efficiency to achieve the deadlines of commitment within 18 months and expenditures within 4 years,
2. Mechanisms for HERA funds distribution should be formulated with the intent to maximize the leverage of the HERA funding with other sources of funding to accommodate the most number of households earning up to the 120% AMI based on US HUD Income thresholds,
3. Mechanisms should be formulated with the intent to improve the access to and "preserve" housing stock (whether for sale or rental) targeted for HERA funds in perpetuity for those earning up to the 120% (area median income) AMI based on US HUD Income thresholds,
4. In keeping with sound governmental practices, plans should not only address the needs driven today by crisis as well as proactively going forward so as to address the long term needs for affordable and workforce housing throughout Miami-Dade County.

Approved this 22<sup>nd</sup> day of October, 2008

  
Carlos Fernandez-Guzman  
Chairman

  
Barry E. Johnson  
President/ C.E.O.

# Setting Southeast Florida's Workforce Housing Agenda

## The Business Community's Perspective

Please join regional business leaders and policy makers in helping to develop Southeast Florida's first Regional Workforce Housing Agenda.

This morning program will commence with a presentation by the FIU Metropolitan Center on the state of Workforce Housing in Southeast Florida. Two expert panels will discuss policy changes and management improvements that can help reduce and eliminate impediments to workforce housing.

Building on this foundation of information, all attendees will then participate in the development of a consensus Regional Workforce Housing Agenda. Meeting facilitation by Don Upton of Fairfield Index Inc. and the latest interactive polling technology will ensure that your time is well spent in this engaging interactive discussion of critical importance to Southeast Florida's economic future and quality of life. At program's end, participants will leave with an understanding of a regional action plan and next steps.

DATE & TIME:  
WEDNESDAY, NOVEMBER 12, 2008 | 8:00 a.m. to 12:30 p.m.

LOCATION:

BROWARD CENTER FOR THE PERFORMING ARTS  
Abdo New River Room | 201 SW 5th Avenue  
Ft. Lauderdale, FL 33312

REGISTRATION FEE:

Members & Non-members \$50

\$60 after October 31, 2008

Limited Seating

SELF PARKING

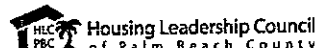
\$5.00 until 6:00 p.m.

City of Ft. Lauderdale public parking garage

**Regional  
Business  
Alliance**



### SUPPORTING ORGANIZATIONS:



This program is made possible, in part, through the generous support of the John D. and Catherine T. MacArthur Foundation

Name: \_\_\_\_\_

Company: \_\_\_\_\_

Complete Address: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Email: \_\_\_\_\_

Guest(s) Names/Company: \_\_\_\_\_

Check enclosed payable to the Greater Miami Chamber of Commerce in the amount of \$ \_\_\_\_\_

Charge my credit card in the amount of \$ \_\_\_\_\_ AMEX VISA MC

Card # \_\_\_\_\_ Exp. Date: \_\_\_\_\_ CVV/Code: \_\_\_\_\_

Name as it appears on card: \_\_\_\_\_

Signature: \_\_\_\_\_

72 - hour cancellation notice required for refund. Payment must accompany reservation, you will not be invoiced.

Fax: 305-371-6248 Mail: Greater Miami Chamber of Commerce, 1604 Biscayne Boulevard, Ballroom Level, Miami, FL 33132

For more information, please contact Marina Foglia, 305-577-5464 or mfoglia@miamichamber.com

## WORKING TO END HOMELESSNESS

**TO:** Sheila Martinez

**FROM:** Ben Burton

**RE:** Comments on Miami-Dade County's Proposed Plan for the Neighborhood Stabilization Program (NSP) under Title III of the Housing and Economic Recovery Act of 2008

**DATE:** November 12, 2008

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I am pleased to submit the following comments to the October 29, 2008 Draft Miami-Dade County Plan for use of federal Neighborhood Stabilization Program funds.

1. In general, Miami-Dade County staff is to be commended for putting together a workable plan that is attuned to the needs of our community within a very short time frame. Overall, the Miami Coalition for the Homeless strongly supports the plan's emphasis on affordable rental housing, our county's greatest need. To ensure that the county's households are best served, however, it is important to target more of this rental housing to those who need it most, the extremely-low and very-low income households that comprise one fourth of our households. Comments regarding specific pages in the plan follow.

### FUNDING ALLOCATION ISSUES

2. The Miami Coalition for the Homeless is pleased with the plan's allocation on page 47 under **TOTAL BUDGET** of a substantial amount of funding for acquisition and rehabilitation of multi-family properties for use as rental housing. This is both appropriate and necessary, since it will address the housing needs of homeowners and renters whose homes have undergone foreclosure, and will allow the limited federal funds to assist more families.
3. On the other hand, because Miami-Dade County is home to a disproportionate number of extremely-low and very-low income households, (more than one in four), the Miami Coalition for the Homeless recommends an increase under **LOW INCOME TARGETING** on page 37, in the amount of funding that will be made available to meet the needs of families with income at or below 50% of AMI. In addition, MCH recommends that this portion of the plan list a specific funding amount to address the needs of extremely-low households (below 30% of AMI).

### NEED TO SPECIFICALLY TARGET EXTREMELY-LOW INCOME HOUSEHOLDS

4. The Miami Coalition would like to see greater specificity with respect to the income level of the households that will be benefited by the acquisition and rehabilitation of multi-family rental housing. For instance, under **PERFORMANCE MEASURES**, on page 49, MCH would like to see an allocation of a portion of the 448 rental housing units that will be acquired and rehabilitated to



households with income below 30% of AMI. This is necessary because of the high proportion of households in Miami-Dade County (one of four) with income below 50% of AMI. Since households with higher income pay more rent, there is an existing incentive to lease to households at or near the 50% of AMI income level. If there is no allotment specific to households below 30% of AMI, they will not be among those benefited by the plan.

5. Greater specificity regarding the income groups that will be benefited by continuing affordability requirements is also important. For instance, in the discussion on pages 30 and 42 regarding the management and lease of Multi-Family Rental Properties, MCH recommends rewording “(c) rents must remain affordable as defined under Part C(2) of this Application” as follows: “(c) rents must remain affordable **to the income groups specified in the agreement with the County.**” If this is not done, the continuing affordability requirement can be met by re-leasing apartments originally set aside for households at or below 50% of AMI to households with income as high as 120% of AMI.
6. Under the same section, MCH would like to see a requirement regarding the number of units that are to be set-aside for households whose income is 30% or below of Area Median Income (AMI). This will require a certain number of the units to remain affordable to very-low income households, and an additional number of units to remain affordable to extremely-low income households. As explained above, extremely-low income families will only benefit from the plan if management and lease agreements are required to reserve some of the units for them.
7. On page 46, the plan describes the County’s proposed **REDEVELOPMENT** activities, which will be directed toward the Scott Carver HOPE VI affordable housing project. Given the political, social and policy context of the Scott Carver HOPE VI project, it is absolutely essential that a significant portion of the 236 rental units in this redevelopment activity assist households with income of 30% AMI or below. The Miami Coalition for the Homeless strongly recommends that this be made part of the plan.

#### **MISCELLANEOUS**

8. The plan states under **ACQUISITIONS & RELOCATION**, on page 38 that the County does not anticipate any relocation being required in pursuing its acquisition and relocation activities. The plan should contain an explanation for this statement.

**"Public Comment"**

**Miami Dade County Proposed Substantial Amendment to the 2008 Action Plan with Funding From Title III of the Housing and Economic Recovery Act of 2008 for the Neighborhood Stabilization Program**

The Affordable Housing Task Force is comprised of attorneys from Legal Services of Greater Miami, Inc., Florida Legal Services, Inc., and community organizers from the Miami Workers Center. This group is committed to the cause of creating and preserving affordable rental housing for extremely low, low, and moderate income individuals.

The federal government's 2008 Neighborhood Stabilization Grant ("NSP") Fund allocation to Miami Dade County (the "Grantee") is an opportunity to protect tenants and stabilize communities affected by the mortgage crisis. Often overlooked are communities comprised of residents who make less than 50% of area median income ("AMI") and who live in multi-family unsubsidized private rental complexes. These residents have often been displaced, or forced to live in deplorable conditions due to the foreclosure or abandonment of their rental complex. We are currently working with tenants in several buildings which are either owned by the lender (post foreclosure) or are in a state of limbo with the lender refusing to finalize the sale and take possession of the property. Our comments and observations are listed below.

**Comments on the Proposed Substantial Amendment to the 2008 Action Plan**

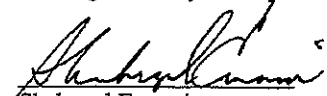
- At least 50% of the funds should be used to assist in the purchase and rehabilitation of multifamily rental buildings, affordable to renters making less than 50% of AMI. Although the County has allocated almost 45% of the total NSP Funds for the acquisition and rehabilitation of foreclosed upon multi-family properties for use as affordable housing, only 25% of this total amount is to benefit renters making less than 50% of AMI. Additionally, it is unclear why the County has allocated the exact amount of \$26,571,480.00 for the acquisition and rehabilitation of foreclosed upon multi-family properties for use as affordable housing, and how the County plans to use this money. A more detailed explanation should be provided.
- Since the County has decided to purchase and operate these properties, they should provide tenants with the same rights as those living in public housing, and the County should operate these properties by following the Miami Dade Housing Agency's Admissions and Continued Occupancy Policy ("ACOP"). The County should commit to rehabilitating properties located in an area of greatest need, and in an area where the rehabilitation efforts will have a positive widespread impact. The funds are specifically provided for neighborhood stabilization, not the stabilization of one building, or the stabilization of random scattered sites.
- The County should make funds available to outside developers. However, they should only consider those developers which are: 1) familiar with the community in which they want to purchase and operate a property; 2) non profit agencies committed to neighborhood redevelopment and community participation; 3) experienced in operating affordable rental complexes targeted to those making less than 50% of AMI; 4) able to leverage additional funds and proceed in a expeditious manner. The highest consideration should be given to tenant groups and their chosen nonprofit partners who wish to purchase and rehabilitate properties. We would also recommend that any nonprofit/tenant partnerships, with an eventual goal of some form of tenant ownership, or other model of tenant control be given highest priority. Neighborhood stabilization can truly only be achieved if the tenants are afforded an opportunity to participate in their housing community.
- The Housing and Economic Recovery Act encourages the use of NSP funds not only to stabilize neighborhoods in the short-term, but to incorporate modern, green building and energy efficiency improvements in all NSP activities. Multi-family rental complexes can serve a larger population and therefore can provide additional environmental benefits for a community. The acquisition and rehabilitation of rental structures in areas such as Liberty City is an excellent way of achieving the goals of the Neighborhood Stabilization Grant.
- Some portion of the funds should be set aside for mobile home park preservation.

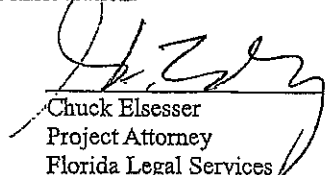
### Observations

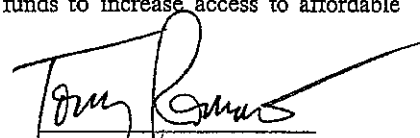
We have been working intensively with tenants in foreclosed buildings for the past year. They are the unrecognized victims of this economic meltdown. These funds not only provide an opportunity to assist these families but it also provides an opportunity to acquire and rehabilitate much needed housing in the poorest neighborhoods of the County.

- Areas of the County such as Liberty City have deteriorated significantly over the past two years due to the foreclosure of multi-family properties and ultimate displacement of its residents.
- Most of these residents wish to remain in their communities and continue to pay affordable rents.
- Many multi-family rental complexes in these areas have been purchased by slumlords during the past several years.
- Many of these complexes are now either in foreclosure or already have been foreclosed.
- The complexes are often in terrible condition due to the inattention of the owner.
- Consequently, these communities, lacking a safe and decent rental environment, have been destabilized.
- Many residents that were homeowners are now unable to purchase another home due to poor credit.
- They need a safe, habitable, affordable environment in which to rent that is close to their schools, work, and community centers.
- Most residents of communities such as Liberty City make much less than 50% of AMI.
- Most residents are unable to qualify for either Section 8 housing or a tax credit rental apartment.
- Thus, their only choice has been small to mid sized multi-family rental complexes, which are traditionally in poor condition, and are now even more neglected due to the current foreclosure crisis.
- Safe, habitable rental housing can serve as an anchor in a community.
- Considering factors such as loss of rental units to conversions, rising costs, aging rental stock, and the foreclosure crisis, using NSP funds to provide safe and habitable multi-family rental housing is an appropriate response considering our current market needs in Miami-Dade County.
- The acquisition of multi-family rental properties at an extremely low cost is an integral part of stabilizing and rehabilitating the current rental stock in communities most affected by the foreclosure crisis.

The work of the Affordable Housing Task Force is funded through a grant from the Florida Bar Foundation. Our mission is the preservation and creation of affordable multi-family rental developments for extremely low, low, and moderate income individuals. Our task force consists of public interest housing and community development attorneys and community organizers that are working on a daily basis in our communities, which the County has identified as areas most affected by the foreclosure crisis. Throughout the past year, we have noticed a substantial increase in the loss of affordable rental housing due to foreclosures. We hope that you will take our comments and observations into consideration. We are here to assist our local governmental entities with this new challenge of creating and implementing policies and procedures in utilizing the NSP funds to increase access to affordable housing. Thank you for your time and consideration.

  
Shahrzad Emami  
Project Attorney  
Legal Services of Greater Miami

  
Chuck Elsesser  
Project Attorney  
Florida Legal Services

  
Tony Romano  
Organizing Director  
The Miami Workers Center

***Lewis Swezy***  
***5709 NW 158<sup>th</sup> Street***  
***Miami Lakes, FL 33014***  
***305-821-0330 Fax: 305-821-0402***

November 12, 2008

*1 Page Via Fax 786-469-2236 and e-mail cdbrown@miamidade.gov*

OCED  
701 NW 1<sup>st</sup> Court, 14<sup>th</sup> Floor  
Miami, FL 33136  
Attn.: Mr. Clarence Brown

Re: Comment on Proposed Substantial Amendment to Action Plan

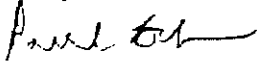
Dear Clarence:

It was nice talking to you the other day; thank you for referring me to the website discussing the \$62,207,200 in HUD Neighborhood Stabilization funds.

I am not sure whether or not any of these funds may be allocated to gap funding for new construction of affordable housing rentals. If not, our comment to the plan would be to propose such allocation because affordable rentals do provide relief to people losing homes to foreclosure and because such gap funding would have a multiplied effect as it is leveraged with funds from outside the County (e.g. housing credits).

Please advise. You can reach me anytime at 786-399-4210.

Sincerely,



Paul Bilton

**Proposed Substantial Amendment to the FY  
2008 Action Plan**

**(Neighborhood Stabilization Program)**

**Comment Form**

Name: THILIP MURRAY JR  
Business Name: NONE  
Email Address: NONE  
Phone Number: 305-257-1397

**Comments:**

IF YOU TEAR SOMETHING DOWN  
THEN BUILD SOMETHING THERE.  
EMPTY LOTS MUST BE MAINTAIN.

Proposed Substantial Amendment to the FY  
2008 Action Plan

(Neighborhood Stabilization Program)

Comment Form

Name: David Wilson  
Business Name: DLH Enterprise  
Email Address: scurry@dlh-enterprise.com  
Phone Number: 305 558 5040

Comments:

The county should put forth a spirit  
financing model where there are less  
risk for the county and more incentive  
for the developer to move forward. Where  
either the acquisition/rehab is reimbursed  
prior to the contract phase.



4175 West 20th Avenue  
Hialeah, Florida 33012-5875  
(305) 825-0300  
(305) 825-1645 Fax

November 7, 2008

Hana Eskra, Acting Director,  
Miami-Dade County  
Office of Community and Economic Development  
701 NW 1st Court, 14th floor,  
Overtown Transit Village Building  
Miami, Florida 33136.

RECEIVED  
2008 NOV 12 PM 3:00  
OFFICE OF COMMUNITY &  
ECONOMIC DEVELOPMENT

RE: Comments to the Neighborhood Stabilization Plan

Dear Ms. Eskra,

Thank you for the opportunity to provide comments to the County's Neighborhood Stabilization Program plan, entitled the NLP Substantial Amendment. Citrus Health Network is a non-profit health care and housing organization, serving over 20,000 persons a year. The majority of the persons we serve are extremely low-income persons. While the plan is designed to address the crisis created by abandoned and foreclosed properties, it presents an important opportunity for this community to provide housing for persons most in need of housing assistance.

According to the Miami Dade County Consolidated Plan, extremely low income households with an extreme housing cost burden, total 30,912 persons. This population is most at risk of becoming homeless. While the federal regulations do not require the County to target this income group, the urgent housing need among this population does. Other communities in the State have also recognized this need and have come up with creative ways to include this population in the plan. For example, in some communities, non-profit organizations are being provided the opportunity to acquire, rehabilitate and manage properties that have been placed in foreclosure, and then rent these housing units to persons who are homeless or extremely low income. The ability of Miami-Dade County to make these properties available debt free allows for the rents to be lowered to increase access to housing for persons who are extremely low income.

According to the Miami Coalition for the Homeless, renting tenants of the homes being foreclosed on are also affected by this housing crisis because they are being evicted with sometimes no prior notice. While Miami-Dade does not keep statistics on nonforeclosure evictions, a review of court records during September 2008 found 2,004 evictions filed in landlord/tenant court, a 9 percent increase over the 1,844 filings in September 2007. The result, according to a National Coalition for the Homeless survey, is a substantial increase in the number of dispossessed. Seventy percent of Florida homeless service providers stated that they had witnessed an increase in homelessness.

*Accredited by the Joint Commission on Accreditation of Healthcare Organizations*



I request that the County explore the options of providing single family homes to non-profits who can rent the homes to persons with urgent housing needs and also request the County identify multifamily rental buildings that can provide affordable housing to extremely low income households.

I would also recommend that the minimum standards for these properties include design features to increase accessibility of the units. For example, developers can be required to incorporate universal design and visitability design features.

Thank you for your consideration of these comments.

Sincerely

A handwritten signature in black ink, appearing to read 'Olga Golik', written in a cursive style.

Olga Golik, Esq.  
Director of Housing and Advocacy



Clarence.

## Sheppard Faber

Attorney at Law  
P.O. Box 331972  
Miami, Florida 33233

Telephone: 305-856-1895

Fax: 305-857-9753

[Yogishep@aol.com](mailto:Yogishep@aol.com)

November 6, 2008

Hana Eskra, Acting Director,  
Miami-Dade County OCED  
Overtown Transit Village Building,  
701 NW 1st Court, 14th floor,  
Miami, Florida 33136.

Re: Miami-Dade County Action Plan

Dear Ms. Eskra:

In reviewing the proposed action plan, I note that no mention is made of properties acquired by lenders by way of acceptance of a deed in lieu of foreclosure. Lenders are encouraged to use this procedure in order to avoid the time and expense of a mortgage foreclosure action. At the same time, the borrowers benefit by not being made defendants in a foreclosure action and having a judgment recorded against them. The community benefits because the process takes a fraction of the time of a foreclosure action, and it is during the several months that a foreclosure action is pending that properties deteriorate, are vandalized and thus negatively affect the neighborhood.

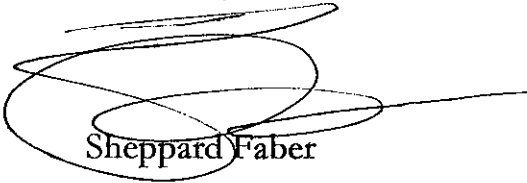
Very simply, the borrowers voluntarily deed the mortgaged property to the lender in return for the lender satisfying the loan on the County records and releasing the borrowers of any personal liability for the mortgage debt. The result of this procedure is the same as a successful foreclosure action: the lender ends up owning the mortgaged property and the mortgage debt is eliminated as a lien against the property.

I practiced mortgage foreclosure law in Miami from 1967 until my retirement from active practice in 1998, representing many major lenders. I can assure you that acceptance of a deed in lieu of foreclosure and judicial foreclosure of a mortgage are considered to be virtually one and the same

remedy, and that acceptance of a deed in lieu of foreclosure when the criteria are met is the preferred path.

I strongly suggest that the Plan make clear that all references to "foreclosed-upon homes" include homes acquired by a lender by way of acceptance of a deed in lieu of foreclosure. Failure to include this clarification could discourage lenders from employing this procedure. This would be to the detriment of both the borrowers and the lender, and ultimately the community.

Yours truly,



Sheppard Faber

SF:abm



# CARLISLE

DEVELOPMENT MANAGEMENT CONSTRUCTION

Dear Mr. Brown,

Carlisle Development Group (Carlisle) would like to thank you for the opportunity to comment on the Neighborhood Stabilization Program. We are an affordable housing development company with knowledge and experience with a variety of different funding sources, the ability to work with local government and community groups, and the desire to implement the community's vision to create a sustainable neighborhood.

Carlisle has established itself as a premiere partner for housing authorities, faith-based institutions, and local partners looking for professional, creative solutions to their unique housing needs. In the spirit of collaboration we would like to briefly comment on your community's proposed plan for the Neighborhood Stabilization Program funds. Starting with the objectives of our recommendations (Desired Outcomes) and followed by the Suggestions listed below, it is our intent to be an active participant in the NSP program.

## **Desired Outcomes:**

- Maximize leverage: Stretch your NSP dollars.
- Minimize ongoing operating subsidies required.
- Avoid concentration of lower income residents in a single building or community.
- Encourage long term success of the very low (50% AMI or below) population.
- Stabilize the local housing market.
- Minimize the grantee's administrative burden.

## **Suggestions:**

- ✓ Establish a Special Needs 2<sup>nd</sup> Mortgage Program. Utilize funds to provide second mortgages to eligible homebuyers. However, forgive second mortgages over time in return for homeowners opening their homes to 1-2 Special Needs population (Youths aging out of Foster Care, Elderly, Disabled, Homeless).

Supplement the nurturing environment provided by the homeowner family with formal case management and outcomes assessments through various social service agencies. A portion of the 10% Administration/Planning funds could be used to assist homebuyer counseling and social service agencies.

- ✓ Allow one grantee with sufficient resources, experience and readiness to proceed to administer the majority of NSP funds. Concentrating funds will achieve better efficiency and minimize the grantee's administrative burden.
- ✓ For the 2009 mini-RFA cycle utilize NSP funds to supplement sources for gap financing applicants with 2008 housing credit awarded developments.



**CARLISLE**  
DEVELOPMENT MANAGEMENT CONSTRUCTION

- ✓ To maximize and allocate the funds in the required 18-month timeframe, present a broad based plan to HUD that includes all of the Eligible Activities allowed.
- ✓ Encourage public/private partnerships and make funds available to non-profit and for-profit developers.
- ✓ Encourage the utilization of funds for a variety of income levels. Combining income groups will reduce risks, improve outcomes, and foster life skills training and informal support networks.

If you would like more detail or should you or staff have any questions or comments, please do not hesitate to contact us.

I appreciate the opportunity to comment and taking some of our recommendations under consideration.

Thank you,

*Matt Greer*

Matthew Greer  
Chief Executive Officer

Cc: Hana Eskra  
Zafar Ahmed

Matthew Greer  
[mgreer@carlisledevelopmentgroup.com](mailto:mgreer@carlisledevelopmentgroup.com)  
2950 SW 27<sup>th</sup> Avenue, Suite 200  
Miami, FL 33133  
305-476-8118 Phone  
305-476-9674 Fax  
Visit our website: [www.carlisledevelopmentgroup.com](http://www.carlisledevelopmentgroup.com)

November 14, 2008

Hana Eskra, Director  
Office of Community and Economic Development  
701 NW 1<sup>st</sup> Court, 14<sup>th</sup> Floor  
Overtown Transit Village Building  
Miami, Florida 33136

RECEIVED  
2008 NOV 17 AM 8:58  
OFFICE OF COMMUNITY &  
ECONOMIC DEVELOPMENT

**Re. Comments on NSP**

Dear Ms. Eskra:

My name is Tom Fogarty. I am a resident of Miami-Dade County Florida. I have been speaking with Clarence Brown concerning a property I own. I was a private lender who had to take back a deed in lieu of foreclosure on a duplex located at 6091 NW 24<sup>th</sup> Court in Miami-Dade County Florida. It is located just a few blocks from the Joseph Caleb Center. I have two low income families renting the units, one at \$600 and one at \$650 per month.

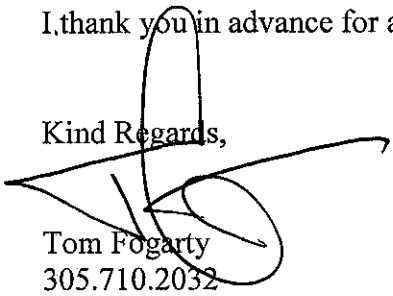
Ms. Eskra, I believe the subject property to be located in the highest priority area of Miami-Dade County as relates to the NSP. Furthermore, the tenants meet the definition of low income families as described therein. However, I have been informed that the County is looking at higher density properties for multi-family purchases.

I respectfully request consideration be given to individual lenders who reside in Miami-Dade County and not only Bank owned REO properties. Furthermore, as you have targeted single family residential properties to purchase, a duplex is very similar in nature as regards property management and I feel should be given equal consideration.

And finally, as to price, the assumption utilized per unit in the NSP documentation was \$125,000. The original sales price on my duplex was \$150,000. I hold a mortgage for \$140,000. I would be willing to discount this to a point that each unit would cost \$60,000, less than half of the cost used in the assumption.

I, thank you in advance for any consideration you may afford me.

Kind Regards,

  
Tom Fogarty  
305.710.2032

Clarence.

**FMI**  
**Florida Mold Inspections, Inc.**  
*The Indoor Air Quality Consultants*  
*Mold & Allergen Investigations & Testing*

RECEIVED  
2008 NOV 10 PM 3:00  
OFFICE OF COMMUNITY & ECONOMIC DEVELOPMENT

**Mr. Jose Cintron**  
**County of Miami-Dade**  
**Office of Community & Economic Development**  
**701 N.W. 1st Court, 14th Floor**  
**Miami, Fl. 33136**

**Dear Mr.Cintron,**

**I am writing in hopes that you are already aware of HUD'S new Neighborhood Stabilization Program (NSP).**

**The Program is authorized under Title 111 of the newly passed Housing and Economic Recovery Act.**

**However, local authorities must submit their budget plans by December 1, 2008.**

**As you are aware, these properties have been abandoned and/or neglected to the point of which there are probable environmental issues.**

**I urge you to encourage/recommend that a MOLD INSPECTION be performed to protect your clients under the NSP program.**

**Thank you for your kind attention.**  
**Please contact me if I can be of any assistance.**

**Sincerely,**

***Peter Romano, President***

## **Princetonian Mobile Home Park**

### **12900 SW 253<sup>rd</sup> Terrace, unincorporated Miami-Dade County**

### **NSP Rental Funding**

- 28 acre mobile home park parcel, consisting of 207 lots. Approximately 70 households earning less than 50% AMGI.
- Zoning: Zoning for the parcel is Princeton Urban Center, and averages 22 units per acre, for a total zoning of approximately 616 units.
- Credits: Impact Fee & Water Sewer Credits of approximately \$1,000,000
- Purchase Price: \$9,625,000, or equivalently:
- \$343,750 per acre
- \$15,625/unit; \$14,000 per unit net of the impact and water and sewer credits.
- Appraised value of the units at the site as of November 2008 is \$25,000 per unit.

### **Benefits**

- **County receives 70 units with households earning less than 50% AMGI.** 25% of NSP units **must** be provided to households earning less than 50% AMGI and the homeownership units and even the rental units typically don't reach those households. Homeownership doesn't reach those households because 50% AMGI households cannot afford to buy, and rentals typically don't reach those very low income households because 50% AMGI units' rents typically can barely cover operating expenses. The only other NSP bucket that will be significantly serving 50% AMGI households is the HOPE VI bucket, as HOPE VI has a large public housing percentage they must provide. Therefore, the only way to achieve the 25% goal is achieve more than 25% in both the HOPE VI and the rental NSP funding buckets.
- **Leveraging:** County had budgeted \$120,000 per unit. \$9,625,000 represents \$48,000 per mobile home lot; \$55,000 per occupied lot. This will allow the average cost/unit in the NSP rental category to now decline to less than \$80,000 per unit, **a 33% savings over the anticipated budget.** This will therefore also allow for the County to own more affordable rental units than original envisioned in the draft NSP budget.
- **Preservation:** The County will be preserving affordable rental housing. The residents of the park pay lot rent of approximately \$350 per unit and now will know their housing will be preserved. 98% of the residents also own their homes, which is atypical of the Miami-Dade trailer parks. So while the County is preserving affordable rentals it is also at the same time preserving homeownership. The average age of trailers is only 7 years and they were all new trailers bought from the manufacturer (prior park owner) Clayton Homes. Clayton Homes is owned by Warren Buffet's Berkshire Hathaway..



**UNITED STATES VETERANS INITIATIVE**  
"SERVING THOSE WHO SERVED"

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Dwight Radcliff

November 18, 2008

Miami-Dade County  
Office of Community and Economic Development  
701 NW 1<sup>st</sup> Court 14<sup>th</sup> Floor  
Miami, Florida 33136  
Attn: Clarene D. Brown

Re: Neighborhood Stabilization Program -- Comments to Draft Substantial Amendment

Dear Mr. Brown:

U.S.VETS has reviewed the Miami-Dade County's NSP Substantial Amendment and is concerned that the proposal does not target the growing housing needs of veterans, including homeless veterans and other low-income veterans in Miami-Dade County, and especially those needing workforce housing as well as clean and sober permanent supportive housing options. Approximately 66,701 veterans live in Miami-Dade County, many low-income and very low-income. Particularly now with the growing number of veterans returning from Iraq and Afghanistan (OEF/OIF), it is critical to recognize the need for veterans housing. At U.S.VETS, we are experienced providers of a wide array of housing options to veterans across the United States.

The New York Times reported this week: "Congress recently asked the Veterans Affairs Department to find out how badly veterans were being affected, particularly by foreclosures. The Army, too, began tracking requests for help on foreclosure issues for the first time. Service organizations report that requests for help from military personnel and new veterans, especially those who were wounded, mentally or physically, and are struggling to keep their houses and pay their bills, has jumped sharply." (See "Newest Veterans Hit Hard by Economic Crisis", New York Times, November 18, 2008) Serious injuries, unemployment and delays in disability claims make these difficult economic times particularly challenging for veterans. Hundreds of thousands of veterans live in the Miami-Dade County, many low-income and very low-income. Particularly now with the growing number of veterans returning from Iraq and Afghanistan (OEF/OIF), it is critical to recognize the need for veterans housing. At U.S.VETS, we are experienced providers of a wide array of housing options to veterans across the United States.

U.S.VETS specifically proposes amending the NSP Substantial Amendment to commit \$5,000,000 of the funds provided under Activity NSP Acquisition and Rehabilitation of Multi-family Affordable Rental Housing, to U.S.VETS for the purchase and rehabilitation of abandoned, condemned and/or foreclosed homes for rent to low-income veterans, both single adults and veterans with families. (The total amount allocated to this Activity is \$26,571,480.) Recognizing the number of veterans residing in Miami-Dade County, NSP funds for affordable rental housing should be targeted to low-income veterans and their families. U.S.VETS is an ideal partner in this capacity. U.S.VETS's expertise could significantly impact the effectiveness of this rental program.

United States Veterans Initiative, a 501(c) (3) non-profit corporation  
733 S. Hindry Avenue, Inglewood, CA 90301 • (310) 348-7600  
[www.usvetsinc.org](http://www.usvetsinc.org) • Tax ID# 95-4382752

*Miami-Dade County NSP Substantial Amendment*





**UNITED STATES VETERANS INITIATIVE**  
"SERVING THOSE WHO SERVED"

While we recognize and commend the efforts of the Miami-Dade County to design an efficient program for the use of the NSP funds, U.S.VETS strongly encourages the County to include in the Substantial Amendment a commitment to veterans housing. U.S.VETS is making similar requests to a handful of NSP funds recipients in the cities and counties where significant numbers of veterans reside. HUD has approved a preference for veterans in their NSP funds Q&A. See <http://www.hud.gov/offices/cpd/communitydevelopment/programs/neighborhoodspg/nspsfaq.cfm>. We greatly appreciate the State of Florida's previous support and collaboration in our efforts to assist veterans in their road to independence. As veterans return from Iraq and Afghanistan, we look forward to working with the Miami-Dade County to find every opportunity to support our veterans.

We appreciate consideration of this public comment. I am available at your convenience by phone at 602.721.0678 or via email at [sbuckley@usvetsinc.org](mailto:sbuckley@usvetsinc.org).

Sincerely,  
  
Stephanie C. Buckley  
Regional Director

**G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)**

**ELIGIBLE ACTIVITY A - FINANCING MECHANISMS**

- (1) **Activity Name:** **Financing Mechanisms:** Soft-Second Loans for Low, Moderate and Middle-Income Households (LMMH)
- (2) **Activity Type:** **Eligible NSP Activity:** (A) Establish financing mechanisms for purchase of foreclosed upon homes and residential properties in the form of soft-second loans and closing costs. Public Services for housing counseling limited to prospective purchasers of the acquired foreclosed-upon homes.  
**CDBG Eligible Activity:** Homeownership Assistance (see 24 CFR 570.201(n). Public services for housing counseling (see 24 CFR 570.201(e))
- (3) **National Objective:** LMMH and LMMC
- (4) **Activity Description:** The County will provide soft-second loans to eligible homebuyers to purchase foreclosed-upon homes in areas of greatest need. Homes that are acquired and rehabilitated will be marketed to potential buyers. Buyers can also locate and purchase REO properties from the bank. Buyers must complete a minimum of eight hours of homebuyer counseling for income-qualified persons provided soft-second loans to purchase foreclosed-upon or abandoned homes.

**Expected Benefit to Income-Qualified Persons**

Opportunity for homeownership by reducing cost of purchase financing. Provides income-eligible individuals with the knowledge necessary to successfully qualify for a first mortgage as well as understand the closing process. Promotes budgeting skills to ensure that homeownership obligations can be met such as timely mortgage and escrow payments and conducting on-going home maintenance to reduce future cost of homeownership.

**Term of Loan**

Soft-second loans will be in the form of a maximum 30-year fixed-interest mortgage

**Financing Rate Range**

The interest rate on the second mortgage will be between 0-6 percent.

**Initial Sales Price**

Sales prices shall be governed by Section 2301(d)(3) of HERA and HUD Notice (73 FR 58330). The sale price shall be no more than an amount equal to the cost to acquire and rehabilitate (including developer fee) the home consistent with the

housing standards contained herein to ensure decent, safe and habitable conditions. However, the County will set a maximum sales price that may result in a sales price lower, but not higher than the HERA-limited sales price.

*Terms Governing Continued Affordability*

A full description of how homes purchased with NSP-funded soft-second loan assistance will remain affordable to individuals and families at or below 120% of AMI can be found in Part C, Section 3 of this Application.

- (5) **Location Description:** In areas of greatest need as described in Part A and Part B of this Application.

- (6) **Performance Measures:** Soft-Second Mortgage Assistance

*Assumption:* \$75,000 average and \$80,000 maximum soft-second mortgage and closing costs; assistance available to purchasers of foreclosed-upon homes located in areas of greatest need.

<b>Units</b>	<b>≤50%</b>	<b>51-80%</b>	<b>81-120%</b>
80	0	16	64

Soft-Second Mortgage Assistance for Homes Purchased through Acquisition/ Rehabilitation Program

*Assumption:* \$75,000 average and \$80,000 maximum soft-second mortgage and closing costs; assistance limited to purchasers of the foreclosed-upon homes purchased through Acquisition/ Rehabilitation Program

<b>Units</b>	<b>≤50%</b>	<b>51-80%</b>	<b>81-120%</b>
50	0	10	40

Homebuyer Counseling for all participants purchasing foreclosed-upon homes through the soft-second mortgage activity.

*Assumption:* \$500 per participant

<b>Units</b>	<b>≤50%</b>	<b>51-80%</b>	<b>81-120%</b>
80	0	16	64

- (7) **Total Budget:** Soft-Second Mortgage Assistance, Closing Costs and Homebuyer Counseling.

Miami-Dade County Allocation: \$9,790,000 (\$40,000 of which represents spending on homebuyer counseling limited to prospective buyers of foreclosed-upon homes)

Eligible NSP Activity: (A) Establish financing mechanisms for purchase of foreclosed upon homes and residential properties in the form of soft-second loans.

CDBG Eligible Activity: 24 CFR 570.201(n) and (see 24 CFR 570.201(e))

- (8) **Responsible Organization:**

Clarence D. Brown Miami-Dade County  
Office of Community and Economic Development  
701 NW 1st Court, 14th Floor

Miami, FL 33136  
(786)469-2221

- (9) **Project Start Date:** Upon receipt of NSP grant funds from HUD.
- (10) **Project End Date:** Four years from the date of receipt of funds.

#### **ELIGIBLE ACTIVITY B-1 - PURCHASE AND REHABILITATION**

- (1) **Activity Name:** Purchase and Rehabilitation of Foreclosed-Upon Single Family Homes for Sale to Income-Qualified Persons
- (2) **Activity Type:** Eligible NSP Activity: Purchase and rehabilitation of abandoned or foreclosed-upon or abandoned homes for sale to eligible buyers. Public Services for housing counseling limited to prospective purchasers of the acquired and rehabilitated foreclosed-upon homes.  
CDBG Eligible Activity: Acquisition (see 24 CFR 570.201(a)) and rehabilitation (see 570.202). Public services for housing counseling (see 24 CFR 570.201(e))
- (3) **National Objective:** LMMH and LMMC
- (4) **Activity Description:** The County will use funds to purchase and rehabilitate foreclosed-upon single-family homes for rehabilitation and sale for LMMH. Buyers must complete a minimum of eight hours of homebuyer counseling for income-qualified persons provided assistance to purchase foreclosed-upon or abandoned homes.

#### **Acquisition and Rehabilitation of Single-Family Homes for Re-Sale to Income-Eligible Persons**

The County will establish a pool of qualified home builders to identify and acquire foreclosed-upon homes from lenders and rehabilitate them to the extent required to meet housing standards set forth in Part C, Section 4 prior to re-sale. The County may also participate in this activity without the use of home builders, developers, and others from the pool.

The County may fund up to full cost of the acquisition and rehabilitation of the properties with NSP funds, subject to a first mortgage on the property with deed restrictions imposing terms to ensure continued affordability (see Part C, Section 3 above).

The homes will be marketed to NSP income-eligible persons having undergone homebuyer counseling, who will be required to secure a first mortgage loan from a lender to purchase the home. Some of the program income from the sales proceeds of the purchases and rehabilitation of homes will be used to provide for

soft-second mortgage as described in Eligible Activity A above to make purchases more affordable. Sales proceeds will also cover a developer's fee for performing the above activities on behalf of the County.

This approach will maximize benefits afforded by the County's NSP allocation by permitting sale proceeds to return to the County's NSP for additional acquisition and rehabilitation of homes and provision of soft-second mortgage assistance during the four years in which NSP activities must be completed.

*Terms Governing Continued Affordability*

The homes assisted with soft-second loan assistance will subject to restrictions set forth in Part C, Section 3 of this Application to ensure continued affordability to the maximum extent possible.

*Expected Benefit to Income-Qualified Persons*

Increased opportunity to own safe, code-compliant affordable housing. Provides income-eligible individuals with the knowledge necessary to successfully qualify for a first mortgage as well as understand the closing process. Promotes budgeting skills to ensure that homeownership obligations can be met such as timely mortgage and escrow payments and conducting on-going home maintenance to reduce future cost of homeownership.

*Sales Price*

Pursuant to HERA requirements, the sale price shall be no more than an amount equal to the cost to acquire and rehabilitate (including developer fee) the home consistent with the housing standards contained herein to ensure decent, safe and habitable conditions. However, the County will set a maximum sales price that may result in a sales price lower, but not higher than the HERA-limited sales price.

*Discount Rate for Acquisition of All Properties for Re-Sale to Income-Eligible Persons*

Miami-Dade County will conduct property appraisals and apply the minimum discount rates required under HERA and HUD Notice (73 FR 58330) to the purchase of foreclosed-upon homes, however, to ensure best use of NSP funds, the County will negotiate purchase prices below such discount rates to the maximum extent possible.

**(5) Location Description**

In areas of greatest need as described in Part A and Part B of this Application.

**(6) Performance Measures: Acquisition and Rehabilitation of Foreclosed-Upon Single Family Homes**

*Assumption:* \$200,000 per home.

<b>Units</b>	<b>≤50%</b>	<b>51-80%</b>	<b>81-120%</b>
50	0	10	40

Homebuyer Counseling for all participants purchasing foreclosed-upon homes through the soft-second mortgage activity.

*Assumption:* \$500 per participant

<b>Units</b>	<b>≤50%</b>	<b>51-80%</b>	<b>81-120%</b>
50	0	10	40

- (7) **Total Budget:** Acquisition and Rehabilitation of Foreclosed-Upon Single Family Homes

Miami-Dade County Allocation: \$10,025,000 (\$25,000 of which represents spending on homebuyer counseling limited to prospective buyers of foreclosed-upon homes)

Eligible NSP Activity: Purchase and rehabilitation of abandoned or foreclosed-upon or abandoned homes of residential property.

CDBG Eligible Activity: 24 CFR 570.201(a), 570.202 and 24 CFR 570.201(e)

- (8) **Responsible Organization**

Clarence D. Brown

Miami-Dade County

Office of Community and Economic Development

701 NW 1st Court, 14th Floor

Miami, FL 33136

(786)469-2221

Elva R. Marin

Miami-Dade County

General Services Administration

Real Estate Section

111 NW 1 Street, 24<sup>th</sup> Floor

Miami, Florida

(305)375-4400

- (9) **Projected State Date:** Upon receipt of NSP grant funds from HUD.

- (10) **Project End Date:** Four years from the date of receipt of funds.

## **ELIGIBLE ACTIVITY B-2 - PURCHASE AND REHABILITATION**

- (1) **Activity Name:** **Purchase and Rehabilitation** of Foreclosed-Upon Multi-Family Rental Housing

- (2) **Activity Type:** Eligible NSP Activity: Purchase and rehabilitation of abandoned or foreclosed-upon or abandoned homes or residential property for rental.

CDBG Eligible Activity: Acquisition (see 24 CFR 570.201(a)) and rehabilitation (see 570.202)

(3) **National Objective:** LMMH

- (4) **Activity Description:** The County will use funds to purchase and rehabilitate foreclosed-upon homes and multi-family rental housing for LMMH.

**Multi-Family Affordable Rental Housing**

Multi-family rental housing properties will be purchased by the County and added to the County's existing affordable rental housing inventory. The County may utilize existing contracts to place the management and maintenance of the properties under the care of property management companies providing the same services for other County-owned rental property. The County may also select for-profit and not-for-profit housing developers to acquire, rehabilitate and manage multi-family rental housing. The County may partner with entitlement cities to acquire multi-family housing.

**Terms Governing Continued Affordability**

All rental properties acquired with NSP funds will be subject to the restrictions set forth below to maintain continued affordability:

- (a) units may only be occupied by individuals and households at 120% of median income or less;
- (b) the number of units that are to be set-aside for certain income groups (i.e. those at or below 50%) must be specified;
- (c) rents must remain affordable as defined under Part C, Section 2 of this Application; and
- (d) the term of the affordability shall not be less than thirty years. If acquired by private developers, the properties will be subject to recorded restrictive covenants and rent regulatory agreements that will include the above restrictions to ensure continued affordability.

**Low Income Housing Benefit**

NSP funds for this activity will be used to meet the low income housing requirement for those individuals and families below 50% of AMI.

**Expected Benefit to Income-Qualified Persons**

Increased access to affordable rental housing.

**Discount Rate for Acquisition of All Properties Acquired for Rental Housing**

Miami-Dade County will conduct property appraisals and apply the minimum discount rates required under HERA and HUD Notice (73 FR 58330) to the purchase of foreclosed-upon homes, however, to ensure best use of NSP funds, the County will negotiate purchase prices below such discount rates to the maximum extent possible.

(5) **Location Description**

In areas of greatest need as described in Part A and Part B of this Application.

- (6) **Performance Measures:** Acquisition and Rehabilitation of Foreclosed-Upon Multi-Family Properties for Use as Affordable Rental Housing

*Assumption:* \$125,000 per unit.

<b>Units</b>	<b>≤50%</b>	<b>51-80%</b>	<b>81-120%</b>
172	122	25	25

- (7) **Total Budget:** Acquisition and Rehabilitation of Foreclosed-Upon Multi-Family Properties

Miami-Dade County Allocation: \$21,571,480

Eligible NSP Activity: Purchase and rehabilitation of abandoned or foreclosed-upon or abandoned homes of residential property.

CDBG Eligible Activity: 24 CFR 570.201(a) and 570.202

- (8) **Responsible Organization**

Clarence D. Brown

Miami-Dade County

Office of Community and Economic Development

701 NW 1st Court, 14th Floor

Miami, FL 33136

(786)469-2221

Elva R. Marin

Miami-Dade County

General Services Administration

Real Estate Section

111 NW 1 Street, 24<sup>th</sup> Floor

Miami, Florida

(305)375-4400

- (9) **Projected State Date:** Upon receipt of NSP grant funds from HUD.

- (10) **Project End Date:** Four years from the date of receipt of funds.

#### **ELIGIBLE ACTIVITY D - DEMOLISH BLIGHTED STRUCTURES**

- (1) **Activity Name:** **Demolish Blighted Structures**

- (2) **Activity Type:** Eligible NSP Activity: Demolish blighted structures  
CDBG Eligible Activity: Clearance activities (see 24 CFR 570.201(d))

- (3) **National Objective:** Benefiting all of the residents of a primarily residential area in which at least 51% of the residents have incomes at or below 120% of area median income (LMMA)



- (4) **Activity Description:** Demolish blighted structures in the areas of greatest need that meet LMMA requirement.

*Expected Benefit to Income-Qualified Persons*

Stabilize neighborhoods of income-qualified persons in LMMAs by removing uninhabitable, unsafe and unsanitary structures that may also serve as havens for criminal activity. Allow for redevelopment in neighborhoods where property stabilization is warranted.

- (5) **Location Description:** In areas of greatest need as described in Part A and Part B of this Application.

(6) **Performance Measures**

Demolish Blighted Structures

Units	≤50%	51-80%	81-120%
80	NA	NA	NA

- (7) **Total Budget:** Demolish Blighted Structures  
Miami-Dade County Allocation: \$1,000,000  
Eligible NSP Activity: Demolish blighted structures.  
CDBG Eligible Activity: 24 CFR 570.201(d)

(8) **Responsible Organization**

Sam Walthour (Uninhabitable Structures Section 17B-15)  
Miami-Dade County  
Office of Neighborhood Compliance  
111 NW 1<sup>st</sup> Street, Suite 1470  
Miami, FL 33128  
(305)375-4845

Charles Danger (Unsafe Structures Section 8.5)  
Miami-Dade County  
Building Department  
11805 S.W. 26th Street  
Miami, Florida 33175  
786-315-2332

Clarence D. Brown  
Miami-Dade County  
Office of Community and Economic Development  
701 NW 1st Court, 14th Floor  
Miami, FL 33136  
(786)469-2221

- (9) **Projected Start Date:** Upon receipt of NSP grant funds from HUD.

- (10) **Project End Date:** Four years from the date of receipt of funds.

## **ELIGIBLE ACTIVITY E-1 – REDEVELOPMENT**

- (1) **Activity Name:** **Redevelopment**
- (2) **Activity Type:** Eligible NSP Activity: Redevelop demolished or vacant properties. CDBG Eligible Activity: 24 CFR 570.201(c)
- (3) **National Objective:** LMMH LMMA  
Creates or retains jobs for persons whose household incomes are at or below 120% of median area income (LMMJ)
- (4) **Activity Description:** Redevelop properties in area(s) of greatest need to create affordable rental housing, homeownership, green spaces, and public facilities; improve existing infrastructure.

### *Low Income Housing Benefit*

NSP funds for redevelopment activities will be used to meet the low income housing requirement for those individuals and families below 50% of AMI.

### *Expected Benefit to Income-Qualified Persons*

Stabilize and enhance neighborhoods experiencing foreclosure distress and increase affordable rental housing stock for income-qualified individuals. Creation of temporary jobs for income-qualified individuals during redevelopment.

- (5) **Location Description:** NSP funds under this activity will be directed toward the Scott Carver HOPE VI affordable housing project, which is located in an area of greatest need in the Liberty City/Model City area and will produce 236 rental units for households at or below 60% of area median income.
- (6) **Performance Measures:** Neighborhood Redevelopment Through Multi-Family Rental Housing Development  
*Assumption:* \$36,441 of NSP funds per unit.

<b>Units</b>	<b>≤50%</b>	<b>51-80%</b>	<b>81-120%</b>
236	59	177	0

- (7) **Total Budget:** Neighborhood Redevelopment Through Multi-Family Rental Housing Development. HOPE VI\*\*

Miami-Dade County Allocation: \$8,600,000

\*\*NSP funds budgeted for Neighborhood Redevelopment through Multi-Family Rental Housing Development will be directed toward the Scott Carver HOPE VI affordable housing project, which will produce 236 rental units for households at or below 60% of area median income. NSP funds will be leveraged with other public and private funds. At least 59 units will be set-aside for 50% of Area Median Income. The NSP funds are specific for covering the infrastructure cost for the development.

Eligible NSP Activity: Redevelop demolished or vacant properties.

CDBG Eligible Activity: 24 CFR 570.201(c)

**(8) Responsible Organization**

Clarence D. Brown

Miami-Dade County

Office of Community and Economic Development

701 NW 1st Court, 14th Floor

Miami, FL 33136

(786)469-2221

**(9) Projected Start Date:** Upon receipt of NSP grant funds from HUD.

**(10) Project End Date:** Four years from the date of receipt of funds.

**ELIGIBLE ACTIVITY E-2 – REDEVELOPMENT**

**(1) Activity Name:** Redevelopment

**(2) Activity Type:** Eligible NSP Activity: Redevelop demolished or vacant properties. CDBG Eligible Activity: 24 CFR 570.201(c)

**(3) National Objective:** LMMH LMMA

Creates or retains jobs for persons whose household incomes are at or below 120% of median area income (LMMJ)

**(4) Activity Description:** Redevelop properties in area(s) of greatest need to create affordable rental housing, homeownership, green spaces, and public facilities; improve existing infrastructure.

Low Income Housing Benefit

NSP funds for redevelopment activities will be used to meet the low income housing requirement for those individuals and families below 50% of AMI.

Expected Benefit to Income-Qualified Persons

Stabilize and enhance neighborhoods experiencing foreclosure distress and increase affordable rental housing stock for income-qualified individuals.

Creation of temporary jobs for income-qualified individuals during redevelopment.

- (5) **Location Description:** NSP funds under this activity will be directed toward the Expanded HOPE VI area, which is located in an area of greatest need in the Liberty City/Model City area and will produce 40 rental units for households at or below 120% of area median income.

- (6) **Performance Measures:** Neighborhood Redevelopment Through Multi-Family Rental Housing Development.

*Assumption:* \$125,000 of NSP funds per unit.

Units	≤50%	51-80%	81-120%
40	20	10	10

- (7) **Total Budget:** Neighborhood Redevelopment Through Multi-Family Rental Housing Development. Expanded HOPE VI area.

Miami-Dade County Allocation: \$5,000,000

Eligible NSP Activity: Redevelop demolished or vacant properties.

CDBG Eligible Activity: 24 CFR 570.201(c)

- (8) **Responsible Organization**

Clarence D. Brown

Miami-Dade County

Office of Community and Economic Development

701 NW 1st Court, 14th Floor

Miami, FL 33136

(786)469-2221

- (9) **Projected Start Date:** Upon receipt of NSP grant funds from HUD.

- (10) **Project End Date:** Four years from the date of receipt of funds.

## **ELIGIBLE ACTIVITY - ADMINISTRATION**

**Activity Name:** Administration

**Activity Type:** Eligible NSP Activity: General administration and planning activities.

CDBG Eligible Activity: General administration and planning activities (see 24 CFR 570.205 and 206)

General Administration and Planning. This reflects a maximum expense that can be made available over five years. Administrative expenses will be subject to careful review. Unused funds will be utilized in other categories, as reviewed and approved by HUD.

**Total Budget Administration**

Miami-Dade County Allocation: \$6,220,720

Any program income generated by the sale, rental, redevelopment, rehabilitation, or any other eligible use that is in excess of the cost to acquire and redevelop (including reasonable development fees) shall be used in accordance with the provisions of Section 2301 of the Housing and Economic Recovery Act of 2008.

### Budget Summary

Eligible Activity	Budget	Benefit 50% AMI	Percentage of Total Grant
A - Financing Mechanisms (including homebuyer counseling)	9,790,000		
B1 - Acquisition/Rehab of Single Family (Sale, including homebuyer counseling)	10,025,000		
B2 - Acquisition/Rehab of Multi-Family (Rental)	21,571,480	15,250,000	25%
D - Demolition	1,000,000		
E1- Redevelopment of Vacant Property (HOPE VI)	8,600,000	2,150,000	3%
E2 - Redevelopment of Vacant Property (Expanded HOPE VI Area)	5,000,000	2,500,000	4%
Administration	6,220,720		
<b>Total</b>	<b>62,207,200</b>	<b>19,900,000</b>	<b>32%</b>

### Performance Measures

Activity	Units	50% and below	51-80%	81-120%
<b>HOMEOWNERSHIP ACTIVITIES</b>				
Soft-Second Mortgage Assistance	130	0	26	104
Acquisition and Rehabilitation of Foreclosed-Upon Single Family Homes for Sale	(50)	0	(10)	(40)
Homebuyer Counseling	(130)		(26)	(104)
<b>TOTAL HOMEOWNERSHIP</b>	<b>130</b>	<b>0</b>	<b>26</b>	<b>104</b>
<b>RENTAL HOUSING</b>				
Acquisition and Rehabilitation of Foreclosed-Upon Multi-Family Properties for Use as Affordable Rental Housing	172	122	25	25
Neighborhood Redevelopment Through Multi-Family Rental Housing (HOPE VI)	236	59	177	0
Neighborhood Redevelopment Through Multi-Family Rental Housing (Expanded HOPE VI Area)	40	20	10	10
<b>TOTAL RENTAL</b>	<b>448</b>	<b>201</b>	<b>212</b>	<b>35</b>
<b>TOTAL HOUSING UNITS</b>	<b>578</b>	<b>201</b>	<b>238</b>	<b>139</b>
<b>OTHER ACTIVITIES</b>				
Demolished Blighted Structures	80	NA	NA	NA


*Note: Values appearing in parentheses ( ) are not included in the total homeownership performance measure.*

# **CERTIFICATIONS**

- (1) **Affirmatively further fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.
- (5) **Acquisition and relocation.** The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.
- (6) **Section 3.** The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (7) **Citizen Participation.** The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.
- (9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.
- (10) **Use NSP funds  $\leq$  120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.
- (11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed

funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

- (12) **Excessive Force.** The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.
- (13) **Compliance with anti-discrimination laws.** The NSP grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.
- (14) **Compliance with lead-based paint procedures.** The activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.
- (15) **Compliance with laws.** The jurisdiction will comply with applicable laws.

  
\_\_\_\_\_  
Signature/Authorized Official

11/25/08  
Date

County Manager  
\_\_\_\_\_  
Title

*Miami-Dade County NSP Substantial Amendment*

*Miami-Dade County NSP Substantial Amendment*

# NSP Substantial Amendment Checklist

*For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the NSP Substantial Amendment and SF-424.*

## Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): <b>Miami-Dade County</b> <i>(identify lead entity in case of joint agreements)</i>  Jurisdiction Web Address: <b><a href="http://www.miamidade.gov/ced/">http://www.miamidade.gov/ced/</a></b> <ul style="list-style-type: none"> <li><i>(URL where NSP Substantial Amendment materials are posted)</i></li> </ul>	NSP Contact Person: <b>Clarence D. Brown</b> Address: <b>Miami-Dade County Office of Community and Economic Development 701 NW 1<sup>st</sup> Court, 14<sup>th</sup> Floor Miami, FL 33136</b> Telephone: <b>(786) 469-2221</b> Fax: <b>(786) 469-2170</b> Email: <b>cdbrown@miamidade.gov</b>
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The elements in the substantial amendment required for the Neighborhood Stabilization Program are:

### ***A. AREAS OF GREATEST NEED***

Does the submission include summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction?

Yes ☒ No ☐ Verification found on page 1.

### ***B. DISTRIBUTION AND USES OF FUNDS***

Does the submission contain a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures?

Yes ☒ No ☐ Verification found on page 28.

**Note:** The grantee's narrative must address the three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

### ***C. DEFINITIONS AND DESCRIPTIONS***

For the purposes of the NSP, do the narratives include:

- a definition of "blighted structure" in the context of state or local law,  
Yes ☒ No ☐ Verification found on page 30.
- a definition of "affordable rents,"  
Yes ☒ No ☐ Verification found on page 33.



- a description of how the grantee will ensure continued affordability for NSP assisted housing,  
Yes ☒ No ☐. Verification found on page 33.
- a description of housing rehabilitation standards that will apply to NSP assisted activities?  
Yes ☒ No ☐. Verification found on page 34.

#### ***D. LOW INCOME TARGETING***

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?  
Yes ☒ No ☐. Verification found on page 41, 92, 93, and 95-98.
- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income?  
Yes ☒ No ☐. Verification found on pages 41, 92, 93 and 95-98.  
Amount budgeted = \$19,900,000.

#### ***E. ACQUISITIONS & RELOCATION***

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?  
Yes ☒ No ☐. (If no, continue to next heading)  
Verification found on page 41.

If so, does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e.,  $\leq 80\%$  of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities?  
Yes ☒ No ☐. Verification found on page 41.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e.,  $\leq 120\%$  of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion)?  
Yes ☒ No ☐. Verification found on page 41.
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?  
Yes ☒ No ☐. Verification found on page 41.

**F. PUBLIC COMMENT PERIOD**

Was the proposed action plan amendment published via the grantee jurisdiction's usual methods and on the Internet for no less than 15 calendar days of public comment?

Yes ☒ No ☐ Verification found on page 42.

Is there a summary of citizen comments included in the final amendment?

Yes ☒ No ☐ Verification found on page 43.

**G. INFORMATION BY ACTIVITY**

Does the submission contain information by activity describing how the grantee will use the funds, identifying:

- eligible use of funds under NSP,  
Yes ☒ No ☐ Verification found on page 87, 89, 91, 93, 95, 96, 97.
- correlated eligible activity under CDBG,  
Yes ☒ No ☐ Verification found on page 87, 89, 91, 93, 95, 96, 97.
- the areas of greatest need addressed by the activity or activities,  
Yes ☒ No ☐ Verification found on page 28, 88, 90, 92, 94, 95, 97.
- expected benefit to income-qualified persons or households or areas,  
Yes ☒ No ☐ Verification found on page 87, 90, 92, 94, 95, 96.
- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?  
Yes ☒ No ☐ Verification found on page 93 and 95-98.
- appropriate performance measures for the activity,  
Yes ☒ No ☐ Verification found on page 88, 90, 93, 94, 95, 97, 98.
- amount of funds budgeted for the activity,  
Yes ☒ No ☐ Verification found on page 88, 91, and 93-98.
- the name, location and contact information for the entity that will carry out the activity,  
Yes ☒ No ☐ Verification found on page 88, 91, 93, 94, 96, 97.
- expected start and end dates of the activity?  
Yes ☒ No ☐ Verification found on page 89, 91, and 93-97.
- If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,  
Yes ☒ No ☐ Verification found on page 90, 92.

- If the activity provides financing, the range of interest rates (if any),  
Yes ☒ No ☐. Verification found on page 87.
- If the activity provides housing, duration or term of assistance,  
Yes ☒ No ☐. Verification found on page 33, 34, 87, 88, 90, 92, 95, 96.
- tenure of beneficiaries (e.g., rental or homeownership),  
Yes ☒ No ☐. Verification found on page 33, 34, 87, 88, 90, 92, 95, 96..
- does it ensure continued affordability?  
Yes ☒ No ☐. Verification found on page 33, 34, 87, 88, 90, 92, 95, 96.

#### ***H. CERTIFICATIONS***

The following certifications are complete and accurate:

- |  |   |                             |
|--|---|-----------------------------|
| (1) Affirmatively furthering fair housing                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-lobbying  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Authority of Jurisdiction                              | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Consistency with Plan                                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Acquisition and relocation                             | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Section 3  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Citizen Participation                                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Following Plan   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (9) Use of funds in 18 months                              | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (10) Use NSP funds $\leq$ 120 of AMI                       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (11) No recovery of capital costs thru special assessments | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (12) Excessive Force                                       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (13) Compliance with anti-discrimination laws              | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (14) Compliance with lead-based paint procedures           | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (15) Compliance with laws                                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |